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HAROLD LEGGETT, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Activity No.: PER20050001
Agency Interest No. 1432

Mr. Toby Hobson
Resident Manager
Graphic Packaging International, Inc.
PO Box 35800
West Monroe, LA 71294-5800

RE: **Part 70 Operating Permit, Graphic Packaging International Inc - West Monroe Mill #31**
Graphic Packaging International Inc., West Monroe, Ouachita Parish, Louisiana

Dear Mr. Hobson:

This is to inform you that the permit for the above referenced facility has been approved under LAC 33:III.501. The permit is both a state preconstruction and Part 70 Operating Permit. The submittal was approved on the basis of the emissions reported and the approval in no way guarantees the design scheme presented will be capable of controlling the emissions as to the types and quantities stated. A new application must be submitted if the reported emissions are exceeded after operations begin. The synopsis, data sheets and conditions are attached herewith.

It will be considered a violation of the permit if all proposed control measures and/or equipment are not installed and properly operated and maintained as specified in the application.

Operation of this facility is hereby authorized under the terms and conditions of this permit. This authorization shall expire at midnight on the _____ of _____, 2013, unless a timely and complete renewal application has been submitted six months prior to expiration. Terms and conditions of this permit shall remain in effect until such time as the permitting authority takes final action on the application for permit renewal. The permit number and agency interest number cited above should be referenced in future correspondence regarding this facility.

Done this _____ day of _____, 2008.

Permit No.: 2160-00001-V3

Sincerely,

Cheryl Sonnier Nolan
Assistant Secretary
CSN: rjj
c: EPA Region VI

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31
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I. Background

The Graphic Packaging International Inc - West Monroe Mill #31 is an existing pulp and paper mill. The West Monroe Mill # 31 currently operates under Permit No. 2160-00001-V2, issued September 27, 2004. Graphic Packaging International also owns and operates the West Monroe Packaging Plant #70 (Agency Interest No. 39129) which adjoins the West Monroe Mill # 31. The packaging plant currently operates under Permit No. 2160-00008-V2, issued October 21, 2005.

This is renewal and modification of the existing Part 70 operating permit for the Mill.

II. Origin

A permit application and Emission Inventory Questionnaire were submitted on April 14, 2005 requesting a Part 70 operating permit for the West Monroe Mill #31. A revised application was submitted on June 15, 2007. Additional information dated July 24, 2007, August 15, 2007, September 7, 2007, September 24, 2007, October 5, 2007, October 22, 2007, December 19, 2007, January, 23, 2008, February 13, 2008, February 18, 2008, February 25, 2008, February 27, 2008, and April 10, 2008, was also submitted.

III. Description

The West Monroe Mill is an integrated pulp and paper mill that converts raw wood to unbleached wood pulp, which is used to produce finished products of coated paperboard, linerboard, corrugated medium, and bag paper. The mill is divided into the following areas based on process sequences: woodyard, pulp mill, recovery, powerhouse, causticizing, paper machines, coatings and additives, and wastewater treatment (L07001).

Logs and chips are brought into the woodyard, stored in piles, and then conveyed to the digesters in the pulp mill. Logs are also converted to chips in the woodyard section of the mill.

Wood chips are cooked in the digesters under elevated temperature and pressure in an alkaline solution of sodium sulfide and sodium hydroxide, referred to as "white liquor." During the cooking process, air trapped with the chips and gases formed during cooking are relieved intermittently. A turpentine condenser is used to recover marketable turpentine from these relief gases. Upon completion of the cooking cycle, the contents of the digester (consisting of the pulp and spent cooking liquor, or "black liquor") are transferred to a blow tank (L02025, L02026, and L02027), where temperature and pressure are returned to

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atmospheric levels. The gases leaving the blow tank pass through a blow heat accumulator tank to condense the moisture. The remaining uncondensed gases throughout the system, referred to as non-condensable gases (low volume high concentration [LVHC] or high volume low concentration [HVLC]) are collected and combusted. The balance of the pulp supply is produced from secondary fiber. The pulp is washed, screened, and sent to storage. A multiple effect evaporator line concentrates the weak black liquor from the pulp washing process. Tall oil soap is a byproduct of the process, which is acidified with sulfuric acid in a tall oil reactor (L03010) at the mill.

There are three kraft digesting lines (L02028, L02029, and L02030), two brownstock washing lines, and one diffusion washing line (L02001, L02002, and L02003, respectively) at the West Monroe mill. There is also one semi-chemical system (L02031 and L02004) at the West Monroe mill.

The spent solution (black liquor) generated during the pulping process is stored in a number of storage tanks, one of which is the 1,125,000 gallon No. 6 Black Liquor Tank (L03021). It is then evaporated and burned in the Nos. 4 and 5 Recovery Boilers (L03004/L03005 and L03007/L03008) to produce smelt for the purpose of recovering inorganic chemicals. Smelt is then dissolved in Recovery Boiler Nos. 4 and 5 Smelt Dissolving Tanks (L03006 and L03009) to form green liquor. The inorganic chemicals (primarily Na_2CO_3) in green liquor are reacted with slaked lime to produce white liquor for use in the pulping process. The spent lime (lime mud) produced during the causticizing process is then calcined in the Lime Kilns Nos. 1 and 2 (L04002 and L04003) to produce lime (CaO) for reuse in the causticizing process.

There are five paper machines (L05001-L05005) which convert the refined pulp into several grades of paper through conventional Fourdrinier dewatering, pressing, and drying. Paper produced at the West Monroe Mill includes coated paperboard, linerboard, corrugated medium, and bag paper. The coatings and additives section of the mill prepares and provides coating, starches, and "wet end" chemicals for use on the paper machines.

Bark from the logs and other types of biomass, in addition to natural gas, are used as fuel in the Bark Boiler (L03003). The Bark Boiler (L03003) and the Nos. 1 and 2 Foster Wheeler Boilers (L03001 and L03002) provide steam for other mill production areas. The boilers each have a normal operating rate of 4,117,200 MMBtu per year. The HVLC gases are combusted in the Bark Boiler (L03003) for control. The Bark Boiler has a normal operating rate of 7,533,600 MMBtu per year. During periods when the Bark Boiler is down for maintenance, the No. 1 Foster Wheeler Boiler (L03001) is used as an alternate control device. The LVHC gases are combusted in the Bark Boiler (L03003) or in the No. 2 Lime Kiln (L04003).

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In this permit modification, the calculations for the paper machines (Emission Point ID L05002, L05003, L05004, and L05005) were reconciled in order to correctly utilize the emission factors used to determine their potential to emit. No modifications were made to the paper machines. The emissions changes do not reflect a physical change or a change in the method of operations.

This permit modification also addresses a reconciliation of the particulate matter emission rate for the Bark Boiler (L03003). In the previous permit modification, the particulate matter emission rate was based on a vendor guarantee of 0.06 lb/MMBTU. However, after a series of performance tests, it was determined that this emission rate was not achievable. This permit modification revises that particulate matter emission rate to 0.0972 lb/MMBTU. This emissions change does not reflect a physical change or a change in the method of operations.

In addition, this permit modification addresses a revised NSR analysis for the No. 4 Recovery Boiler Economizer/Generating Bank Project. This project was completed under the approval granted by Permit No. 2160-00001-V2. This permit modification proposes to revise the NSR analysis performed in support of this project in order to use more representative emissions data. The analysis shows that the emissions increase for all NSR pollutants due to this project, including sulfur dioxide, remains below the significance level.

With this modification, Graphic Packaging requests the following changes:

- Revision of applicability tables.
- Reconciliation of emissions, emission points, administrative errors, and emission point descriptions
- Removal of the weekly visual inspection for opacity on the No. 4 Recovery Boiler (L03004/L03005) as required by Part 70 Specific Condition No. 2. Graphic Packaging operates a continuous opacity monitoring system (COMS) on the stack of this boiler as required by NESHAP Subpart MM.
- Update of VOC emissions for the Wastewater Treatment (L07001) to reflect the highest emission rate from the Condensate Treatment Compliance Test showing compliance with NESHAP Subpart S, for the previous eight quarters and a statistical analysis.
- Incorporation of the reestablished alternative monitoring parameters for the Wastewater Treatment Unit (Emission Point ID L07001) for the purpose of

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demonstrating compliance with the Cluster Rule condensate collection and treatment provisions (40 CFR Part 63, Subpart S).

- Routing High Volume, Low Concentration (HVLC) sources to the No. 1 Foster Wheeler Boiler (L03001), as an alterative control device, when the Bark Boiler is down for maintenance.
- Update to the Compliance Assurance Monitoring (CAM) plan for the Bark Boiler (L03003), Lime Kilns Nos. 1 and 2 (L04002 and L04003), and the Slaker and Lime Silo Scrubber (L04001). Only certain pollutants from these units are subject to CAM.
- Combustion of recycle oil in the Nos.1 and 2 Lime Kilns (L04002 and L04003) and the installation of a recycle oil storage tank (L09010).
- Incorporate a permit shield for the No. 5 Recover Boiler (L03007 and L03008) and the No. 5 Smelt Dissolving Tank (L03009). This permit shield will allow the mill to show compliance with all applicable requirements of 40 CFR 60 Subpart BB through compliance with the more stringent 40 CFR 63 Subpart MM.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	782.08	1067.67	+ 285.59
SO ₂	1601.80	2462.90	+ 861.10
NO _x	3498.01	3653.40	+ 155.39
CO	4073.95	3654.94	- 419.01
VOC	1306.38	3614.42	+ 2308.04
TRS	227.21	317.84	+ 90.63

Changes represented in this table are due to use of updated emission factors and reconciliation of emissions. The portion of these emissions that is due to a physical change or change in the method of operation does not exceed the Prevention of Significant Deterioration significance level and is therefore not subject to the requirements of the PSD program.

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LAC 33:III Chapter 51 Toxic Air Pollutants (TAP)

VOC TAP				Non-VOC TAP	
Pollutant	Emissions (TPY)	Pollutant	Emissions (TPY)	Pollutant	Emissions (TPY)
1,1,2-Trichloroethane	0.21	Ethylbenzene	0.13	1,1,1-Trichloroethane	0.26
1,2,4-Trichlorobenzene	1.06	Formaldehyde	7.64	Ammonia (and compounds)	306.18
1,2-Dichloroethane	0.019	Hexachlorocyclopentadiene	0.04	Antimony (and compounds)	0.016
2,2,4-Trimethylpentane	0.06	n-Hexane	10.47	Arsenic (and compounds)	0.032
Acetaldehyde	150.86	Iodomethane	0.08	Barium (and compounds)	1.229
Acetophenone	0.09	Isophorone	0.01	Beryllium (and compounds)	0.072
Acrolein	4.183	Methanol	1346.17	Cadmium (and compounds)	0.018
Acrylamide	0.035	Methyl bromide	0.14	Chlorine	0.01
Acrylonitrile	0.15	Methyl chloride	7.30	Chromium VI (and compounds)	0.039
Aniline	0.01	Methyl ethyl ketone	14.09	Cobalt compounds	0.09
Bis(2-ethylhexyl)phthalate	0.02	Methyl isobutyl ketone	3.57	Copper (and compounds)	0.158
Benzene	1.71	Naphthalenes	3.66	Dichloromethane	3.88
Carbon disulfide	1.20	Phenol	1.95	Hydrochloric acid	33.97
Carbon tetrachloride	1.02	Phosphorous	1.71	Hydrogen fluoride	0.16
Chlorinated dibenzo furans	0.0002	PAH	2.208	Hydrogen sulfide	119.69
Chlorinated dibenzo-p-dioxins	0.00001	Propionaldehyde	4.96	Lead compounds	0.21
Chlorobenzene	0.044	Styrene	29.27	Manganese (and compounds)	3.02
Chloroform	2.10	Toluene	2.75	Mercury (and compounds)	0.017
Chloroprene	0.02	Trichloroethylene	4.00	Nickel (and compounds)	0.115
Cresols	1.66	Vinyl acetate	57.44	Selenium (and compounds)	0.011
Cumene	1.84	Vinyl chloride	0.06	Sulfuric acid	16.03
Diethyl phthalate	0.25	Xylenes	3.73	Tetrachloroethylene	0.61
Ethyl acrylate	1.10	VOC TAP Total	1669.02	Zinc (and compounds)	1.60
				Non-VOC TAP Total	487.42

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IV. Type of Review

This permit was reviewed for compliance with 40 CFR 70, the Louisiana Air Quality Regulations, New Source Performance Standards (NSPS), and National Emission Standards for Hazardous Air Pollutants (NESHAP). Prevention of Significant Deterioration (PSD) does not apply to this facility. The reasonable possibility provisions of the PSD program were found to be applicable and included as specific conditions in this permit.

This facility is a major source of toxic air pollutants (TAPs) pursuant to LAC 33:III.Chapter 51.

The following table lists the Class I, II, and III TAPs emitted from the West Monroe Mill #31 and the West Monroe Packaging Plant #70 (Agency Interest No. 39129) along with their corresponding Minimum Emission Rate (MER). All sources which emit any Class I or Class II TAPs must meet Maximum Achievable Control Technology (MACT) according to LAC 33:III.5109.A. MACT for these sources is described in the applicable NESHAP standards listed in Section XI. Table 1 and the Specific Requirements section of this permit.

LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPS)	Class	MER (lb/yr)	MER (TPY)	Annual Emission Rate (TPY)	Greater Than or Equal To MER?
Acrylonitrile	I	35.0	0.0175	0.15	Yes
Arsenic (and compounds)	I	25.0	0.0125	0.032	Yes
Benzene	I	260.0	0.13	1.71	Yes
Beryllium (and compounds)	I	25.0	0.0125	0.072	Yes
Cadmium (and compounds)	I	25.0	0.0125	0.018	Yes
Chromium VI (and compounds)	I	25.0	0.0125	0.039	Yes
Formaldehyde	I	260.0	0.13	7.64	Yes
Nickel (and compounds)	I	25.0	0.0125	0.115	Yes
Vinyl chloride	I	240.0	0.12	0.06	No
Acetaldehyde	II	700.0	0.35	150.86	Yes
Acrolein	II	25.0	0.0125	4.183	Yes
Acrylamide	II	25.0	0.0125	0.035	Yes
Aniline	II	600.0	0.30	0.01	No
Antimony (and compounds)	II	37.5	0.01875	0.016	No
Barium (and compounds)	II	37.5	0.01875	1.229	Yes
Carbon disulfide	II	2,400.0	1.20	1.20	Yes
Carbon tetrachloride	II	83.5	0.04175	1.02	Yes
Chlorinated dibenzo-p-dioxins	II	0.0001	5.0E-8	0.0002	Yes
Chlorinated dibenzo furans	II	0.0001	5.0E-8	0.00001	Yes
Chlorobenzene	II	25.0	0.0125	0.044	Yes

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LAC 33:III.Chapter 51 Toxic Air Pollutants (TAPS)	Class	MER (lb/yr)	MER (TPY)	Annual Emission Rate (TPY)	Greater Than or Equal To MER?
Chloroform	II	69.5	0.03475	2.10	Yes
Chloroprene	II	2,700.0	1.35	0.02	No
Copper (and compounds)	II	25.0	0.0125	0.158	Yes
Dibutyl phthalate	II	380.0	0.19	0.25	Yes
1,4-Dichlorobenzene	II	20,000.0	10.00	0.02	No
1,2-Dichloroethane	II	48.5	0.02425	0.019	No
Dichloromethane	II	540.0	0.27	3.88	Yes
Ethyl acrylate	II	1,500.0	0.75	1.10	Yes
Ethyl benzene	II	20,000.0	10.00	0.13	No
Glycol ethers	II	1,200.0	0.60	40.90	Yes
Manganese (and compounds)	II	75.0	0.0375	3.02	Yes
Mercury (and compounds)	II	25.0	0.0125	0.017	Yes
Naphthalene	II	1,990.0	0.995	3.66	Yes
Phenol	II	1,400.0	0.70	1.95	Yes
Polynuclear aromatic hydrocarbons	II	25.0	0.0125	2.208	Yes
Selenium (and compounds)	II	25.0	0.0125	0.011	No
Styrene	II	2,000.0	1.00	32.28	Yes
Tetrachloroethylene	II	2,800.0	1.40	0.61	No
1,1,2-Trichloroethane	II	4,000.0	2.00	0.21	No
Trichloroethylene	II	900.0	0.45	4.00	Yes
Xylene (mixed isomers)	II	20,000.0	10.00	3.73	No
Ammonia	III	1,200.0	0.60	306.18	Yes
n-Butyl alcohol	III	11,000.0	5.50	1.27	No
Chlorine	III	100.0	0.05	0.01	No
Cresol	III	1,600.0	0.80	1.66	Yes
Cumene	III	18,000.0	9.00	1.84	No
Ethylene glycol	III	9,000.0	4.50	0.06	No
n-Hexane	III	13,000.0	6.50	10.47	Yes
Hydrochloric acid	III	500.0	0.25	33.97	Yes
Hydrofluoric acid	III	63.0	0.03	0.16	No
Hydrogen sulfide	III	1,000.0	0.50	119.69	Yes
Methanol	III	20,000.0	10.00	1,346.17	Yes
Methyl ethyl ketone	III	20,000.0	10.00	14.09	Yes
Methyl isobutyl ketone	III	15,000.0	7.50	3.57	No
Propionaldehyde	III	700.0	0.35	4.96	Yes
Sulfuric acid	III	75.0	0.0375	16.03	Yes
Toluene	III	20,000.0	10.00	2.75	No
1,1,1-Trichloroethane	III	20,000.0	10.00	0.26	No
Vinyl acetate	III	2,600.0	1.30	64.75	Yes
Zinc (and compounds)	III	200.0	0.10	1.60	No

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Sources which combust Group 1 virgin fossil fuels are exempt from the provisions of Subchapter A of LAC 33:III.Chapter 51, per LAC 33:III.5105.B.2.a. Sources which combust wood residue fuels are exempt from the provisions of LAC 33:III.5109, per LAC 33:III.5105.B.7

The West Monroe Mill #31 is subject to the following NSPS and NESHAP regulations:

- NSPS – Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971
- NSPS – Subpart Db - Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units
- NSPS – Subpart BB – Standards of Performance for Kraft Pulp Mills
- NSPS – Subpart IIII - Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
- NESHAP – Subpart S – National Emission Standards for Hazardous Air Pollutants from the Pulp and Paper Industry
- NESHAP – Subpart MM – National Emission Standards for Hazardous Air Pollutants for Chemical Recovery Combustion Sources at Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mills

V. Credible Evidence

Notwithstanding any other provisions of any applicable rule or regulation or requirement of this permit that state specific methods that may be used to assess compliance with applicable requirements, pursuant to 40 CFR Part 70 and EPA's Credible Evidence Rule, 62 Fed. Reg. 8314 (Feb. 24, 1997), any credible evidence or information relevant to whether a source would have been in compliance with applicable requirements if the appropriate performance or compliance test or procedure had been performed shall be considered for purposes of Title V compliance certifications. Furthermore, for purposes of establishing whether or not a person has violated or is in violation of any emissions limitation or standard or permit condition, nothing in this permit shall preclude the use, including the exclusive use, by any person of any such credible evidence or information.

VI. Public Notice

A notice requesting public comment on the permit was published in *The Advocate*, Baton Rouge, on <date>, 200X; and in the <local paper>, <local town>, on <date>, 200X. A copy of the public notice was mailed to concerned citizens listed in the Office of Environmental Services Public Notice Mailing List on <date>. The draft permit was also submitted to US EPA Region VI on <date>. All comments will be considered prior to the final permit decision.

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VII. Effects on Ambient Air

Dispersion Model(s) Used: ISCST3

Pollutant	Time Period	Calculated Maximum Ground Level Concentration	Louisiana Toxic Air Pollutant Ambient Air Quality Standard or (National Ambient Air Quality Standard {NAAQS})
Acrolein	8-hour	4.009	5.4
Chromium VI	Annual	0.002	0.01
PAH	Annual	0.006	0.06
Sulfuric Acid	8-hour	0.311	23.8

VIII. General Condition XVII Activities

Work Activity	Schedule	Emission Rates (Tons)				
		PM ₁₀	SO ₂	NO _X	CO	VOC
Slaker Scrubber Maintenance	12 hrs. Monthly	4.8				

IX. Insignificant Activities

ID No.	Description	Citation
INS001	Kraft Bldg Defoamer Tank (15,227 gallons)	LAC 33:III.501.B.5.D
INS002	Pm07 East Size Tank (875 gallons)	LAC 33:III.501.B.5.A.10
INS003	Pm07 West Size Tank (875 gallons)	LAC 33:III.501.B.5.A.10
INS004	Pm07 Bulk Oil Storage Tank (9,776 gallons)	LAC 33:III.501.B.5.A.3
INS005	Hercules Tank 921194 (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS008	Kraft Bldg Defoamer Day Tank (881 gallons)	LAC 33:III.501.B.5.A.3
INS010	Pm07 Gloss Calendar Hot Oil Tank (275 gallons)	LAC 33:III.501.B.5.A.3

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ID No.	Description	Citation
INS011	Pm07 # 7 Dryer Oil Reservoir (7,000 gallons)	LAC 33:III.501.B.5.A.3
INS012	Pm07 Gloss Calendar Hot Oil Expansion Tank (252 gallons)	LAC 33:III.501.B.5.A.3
INS013	Used Oil - #1 Hp Boiler (2,931 gallons)	LAC 33:III.501.B.5.A.3
INS014	Used Oil – Garage (2,391 gallons)	LAC 33:III.501.B.5.A.3
INS015	Used Oil – Next To F&W Boilers (1,240 gallons)	LAC 33:III.501.B.5.A.3
INS016	Used Oil – Lube Building (6,781 gallons)	LAC 33:III.501.B.5.A.3
INS017	Pm02 Inner Calendar Dryer Oil Tank (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS018	Rewetter Transfer Tank (470 gallons)	LAC 33:III.501.B.5.A.3
INS019	Pm01 Rewetter Storage Tank (881 gallons)	LAC 33:III.501.B.5.A.3
INS025	Tall Oil Sulfuric Acid Tank (28,859 gallons)	LAC 33:III.501.B.5.D
INS026	Tall Oil Spent Acid Storage Tank (79,308)	LAC 33:III.501.B.5.D
INS027	Powr Fwbl Sulfuric Acid Storage Tank (10,000 gallons)	LAC 33:III.501.B.5.D
INS028	Sulfuric Acid Storage Tank (20,303 gallons)	LAC 33:III.501.B.5.D
INS029	Caus Sodium Sulfide Tank (14,381 gallons)	LAC 33:III.501.B.5.A.4
INS033	Caus H End West Acid Storage Tank (12,690 gallons)	LAC 33:III.501.B.5.D
INS034	Caus H End Center Acid Storage Tank (19,857 gallons)	LAC 33:III.501.B.5.D
INS035	Caus H End East Acid Storage Tank (19,857 gallons)	LAC 33:III.501.B.5.D
INS036	Kraft Bldg Phos Acid Storage Acid Tank (6,016 gallons)	LAC 33:III.501.B.5.A.4
INS037	Kraft Bldg Liq Htr Acid Clean Tank (1,028 gallons)	LAC 33:III.501.B.5.A.4
INS043	Watr Dem West Acid Tank (18,423 gallons)	LAC 33:III.501.B.5.D
INS044	Watr Dem East Acid Tank (18,423 gallons)	LAC 33:III.501.B.5.D

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ID No.	Description	Citation
INS045	Watr Dem North Acid Tank (18,423 gallons)	LAC 33:III.501.B.5.D
INS046	Watr Clar Alum Tank (38,069 gallons)	LAC 33:III.501.B.5.A.4
INS048	Hercules Tank 930527 (5,000 gallons)	LAC 33:III.501.B.5.A.3
INS049	Hercules Tank 910200 (6,400 gallons)	LAC 33:III.501.B.5.A.3
INS050	Hercules Tank 870649 (2,500 gallons)	LAC 33:III.501.B.5.A.3
INS054	Hercules Tank 942572 (2,500 gallons)	LAC 33:III.501.B.5.A.3
INS056	Paper Machine Acid Use Tank (752 gallons)	LAC 33:III.501.B.5.D
INS057	#7 Paper Machine Alum Tank (1,692 gallons)	LAC 33:III.501.B.5.A.4
INS061	Diesel Tank – Storeroom (1,430 gallons)	LAC 33:III.501.B.5.A.3
INS062	Diesel Tank – Compressors (3,580 gallons)	LAC 33:III.501.B.5.A.3
INS063	Diesel Tank – Contractors Yard (1,906 gallons)	LAC 33:III.501.B.5.A.3
INS064	Diesel Tank – Contractors Yard (529 gallons)	LAC 33:III.501.B.5.A.3
INS065	Watr Swim Fire Pump Diesel Tank (360 gallons)	LAC 33:III.501.B.5.A.3
INS066	Diesel Tank – Woodmill (2,358 gallons)	LAC 33:III.501.B.5.A.3
INS067	Diesel Tank – Woodmill (2,358 gallons)	LAC 33:III.501.B.5.A.3
INS086	Hercules Tank 2335 (560 gallons)	LAC 33:III.501.B.5.A.3
INS087	Hercules Tank 910729 (1,200 gallons)	LAC 33:III.501.B.5.A.3
INS088	Hercules Tank 901101 (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS092	Hercules Tank 7263 (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS093	Hercules Tank 910730 (1,200 gallons)	LAC 33:III.501.B.5.A.3
INS094	Hercules Tank 901100 (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS096	Hercules Tank 930155 (550 gallons)	LAC 33:III.501.B.5.A.3
INS098	Hercules Tank 942570 (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS099	Hercules Tank 900573 (6,400 gallons)	LAC 33:III.501.B.5.A.3
INS101	Hercules Tank 980966 (8,402 gallons)	LAC 33:III.501.B.5.A.3
INS104	Hercules Tank 901103 (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS107	Hercules Tank 950401 (4,000 gallons)	LAC 33:III.501.B.5.A.3
INS108	Hercules Tank – Low Pressure Boiler (1,000	LAC 33:III.501.B.5.A.3

AIR PERMIT BRIEFING SHEET
AIR PERMITS DIVISION
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31
Agency Interest No.: 1432
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

ID No.	Description	Citation
	gallons)	
INS109	Hercules Tank 930156 (550 gallons)	LAC 33:III.501.B.5.A.3
INS111	Hercules Tank 950517 (4,000 gallons)	LAC 33:III.501.B.5.A.3
INS112	Hercules Tank 900691 (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS113	Hercules Tank 952543R (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS115	Hercules Tank 7262 (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS116	Cck Emulsifier Size #1 Tank (17,000 gallons)	LAC 33:III.501.B.5.D
INS121	Mineral Spirits Tank (3,384 gallons)	LAC 33:III.501.B.5.A.3
INS122	Diesel Tank – Painter’s Area of Contractor Yard (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS123	Diesel Tank – Painter Area (1,000 gallons)	LAC 33:III.501.B.5.A.3
INS145	Hercules Tank 210041 (550 gallons)	LAC 33:III.501.B.5.A.3
INS146	Hercules Tank 210177 (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS147	Hercules Tank 210178 (2,000 gallons)	LAC 33:III.501.B.5.A.3
INS148	Hercules Tank 220293 (1,200 gallons)	LAC 33:III.501.B.5.A.3
INS164	Cck Alum Storage Tank (63,334 gallons)	LAC 33:III.501.B.5.A.4
INS168	Cck #1 Alum Supply Tank (2,300 gallons)	LAC 33:III.501.B.5.A.4
INS169	Cck #2 Alum Supply Tank (2,500 gallons)	LAC 33:III.501.B.5.A.4
INS173	Cck Emulsifier Size #2 Tank (17,000 gallons)	LAC 33:III.501.B.5.D
INS180	Wdml Chip Receiving Hydraulic Tank (240 gallons)	LAC 33:III.501.B.5.A.2
INS181	Wdml Mini Chip Hydraulic Tank (240 gallons)	LAC 33:III.501.B.5.A.2
INS182	Wdml Bark #5 Unloader Hydraulic Tank (240 gallons)	LAC 33:III.501.B.5.A.2
INS183	Wdml Chip Receiving #3 Unl Hyd Tank (240 gallons)	LAC 33:III.501.B.5.A.2
INS184	Wdml Receiving Hydraulic Tank (240 gallons)	LAC 33:III.501.B.5.A.2
INS186	Kraft D Digester #1 Accumulator Tank (193 gallons)	LAC 33:III.501.B.5.A.2

AIR PERMIT BRIEFING SHEET
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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31
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Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

ID No.	Description	Citation
INS187	Kraft D Digester #2 Accumulator Tank (193 gallons)	LAC 33:III.501.B.5.A.2
INS190	Pm01 #1 Lube Oil Sump Tank (150 gallons)	LAC 33:III.501.B.5.A.2
INS191	Pm01 #2 Lube Oil Sump Tank (150 gallons)	LAC 33:III.501.B.5.A.2
INS192	Pm01 #3 Lube Oil Sump Tank (150 gallons)	LAC 33:III.501.B.5.A.2
INS193	Pm01 Lube Oil Storage Tank (3,000 gallons)	LAC 33:III.501.B.5.A.3
INS195	Pm02 Calendar Oil System (400 gallons)	LAC 33:III.501.B.5.A.3
INS196	Pm02 Dryer Oil Sump Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS197	Pm02 Dryer Oil Tank (810 gallons)	LAC 33:III.501.B.5.A.3
INS198	Pm02 South Starch Tank (300 gallons)	LAC 33:III.501.B.5.A.10
INS199	Pm02 North Starch Tank (300 gallons)	LAC 33:III.501.B.5.A.10
INS200	Pm02 North Center Starch Tank (300 gallons)	LAC 33:III.501.B.5.A.10
INS201	Pm02 South Center Starch Tank (300 gallons)	LAC 33:III.501.B.5.A.10
INS202	Pm07 Bks Coater Starch Use Tank (630 gallons)	LAC 33:III.501.B.5.A.10
INS203	Cck Calendar Starch Dilution Tank (1,200 gallons)	LAC 33:III.501.B.5.A.10
INS204	Cck Cal Starch Cooker Supply Tank	LAC 33:III.501.B.5.A.10
INS205	Cck Cooked Calender Starch Tank (4,500 gallons)	LAC 33:III.501.B.5.A.10
INS206	Cck Size Press Starch Dilution Tank (1,200 gallons)	LAC 33:III.501.B.5.A.10
INS207	Cck Size Pre Starch Cooker Supply Tank	LAC 33:III.501.B.5.A.10
INS208	Cck Size Press Starch Cooker Tank	LAC 33:III.501.B.5.A.10
INS209	Cck Calender Starch Cooker (200 gallons)	LAC 33:III.501.B.5.A.10
INS210	Cck Size Press Cooked Starch Tank (4,500 gallons)	LAC 33:III.501.B.5.A.10
INS211	Cck Wet End Starch Dilution Tank (1,200 gallons)	LAC 33:III.501.B.5.A.10
INS212	Cck Wet Starch Cooker Supply Tank	LAC 33:III.501.B.5.A.10
INS213	Cck Wet End Starch Steam Trap	LAC 33:III.501.B.5.D

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West Monroe Mill #31
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Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

ID No.	Description	Citation
INS214	Cck Cooked Wet End Starch Tank #1 (4,500 gallons)	LAC 33:III.501.B.5.A.10
INS215	Cck Cooked Wet End Starch Tank #2 (4,500 gallons)	LAC 33:III.501.B.5.A.10
INS216	Cck Wet End Starch Cooking Tank (1,200 gallons)	LAC 33:III.501.B.5.A.10
INS217	Cck Wet End Starch Cooker (200 gallons)	LAC 33:III.501.B.5.A.10
INS218	Pm07 Octifilm Tank (50 gallons)	LAC 33:III.501.B.5.A.2
INS219	Pm05 #5 pm Roll Lowering Hydraulic Tank (35 gallons)	LAC 33:III.501.B.5.A.2
INS220	Pm05 Bowser Lube Filter Tank (300 gallons)	LAC 33:III.501.B.5.A.3
INS221	Pm05 Bowser Lube Cushion Tank (300 gallons)	LAC 33:III.501.B.5.A.3
INS222	Pm05 #5 Pm Breast Roll Hydraulic Tank (500 gallons)	LAC 33:III.501.B.5.A.3
INS223	Pm06 #6 Pm West Starch Tank	LAC 33:III.501.B.5.A.10
INS224	Pm 06 #6 Pm West Center Starch Tank (500 gallons)	LAC 33:III.501.B.5.A.10
INS225	Pm06 #6 Pm East Center Starch Tank (500 gallons)	LAC 33:III.501.B.5.A.10
INS226	Pm06 #6 Pm East Starch Tank (500 gallons)	LAC 33:III.501.B.5.A.10
INS227	Watr Clar East Coagulate Tank (750 gallons)	LAC 33:III.501.B.5.A.3
INS228	Watr Clar West Coagulate Tank (750 gallons)	LAC 33:III.501.B.5.A.3
INS230	Powr #1 Hp Forced Draft Fan Lube Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS231	Powr #1 Hp Induced Draft Fan Lube Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS232	Powr # 1 Hp #1 Feed Pump Oil Tank (260 gallons)	LAC 33:III.501.B.5.A.3
INS233	Powr #1 Hp #2 Feed Pump Oil Tank (400 gallons)	LAC 33:III.501.B.5.A.3
INS234	Powr Ophs #4 Turbine Oil Storage Tank (9,500	LAC 33:III.501.B.5.A.3

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West Monroe Mill #31
Agency Interest No.: 1432
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

ID No.	Description	Citation
	gallons)	
INS235	Powr Fwbl Servo Hydraulic Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS236	Powr Fwbl #5 Turbine Lube Oil Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS237	Powr #6 Turbine Lube Oil Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS238	Powr #6 Turbine Oil Conditioner Tank (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS239	Powr #6 Turbine Hydraulic Unit (50 gallons)	LAC 33:III.501.B.5.A.2
INS240	Ouachita Fertilizer Tank – Wastewater Clarifier (6,200 gallons)	LAC 33:III.501.B.5.D
INS241	Ouachita Fertilizer Tank – Wastewater Pond 3 to Pond 4 (1,900 gallons)	LAC 33:III.501.B.5.D
INS242	Diesel Tank – Plant 70 (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS243	Diesel Tank – Plant 70 (9,500 gallons)	LAC 33:III.501.B.5.A.3
INS244	Diesel Tank – Plant 70 (9,500 gallons)	LAC 33:III.501.B.5.A.3
-	Salamanders (19,300 BTU/lb)	LAC 33:III.501.B.5.A.5
-	Turpentine Truck/Rail Loading	LAC 33:III.501.B.5.D
Research and Development Facility		
-	Boiler	LAC 33:III.501.B.5.D
-	BK Sumerville Screen	LAC 33:III.501.B.5.D
-	Screen (used with Digester System)	LAC 33:III.501.B.5.D
-	Digester Relief and Blow Tank	LAC 33:III.501.B.5.D
-	Mixers #1 – 5	LAC 33:III.501.B.5.D

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31
Agency Interest No.: 1432
Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

X. **Table 1: Applicable Louisiana and Federal Air Quality Requirements**

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31

Agency Interest No.: 1432

Graphic Packaging International, Inc.

West Monroe: Ouachita Parish, Louisiana

X. Table 1: Applicable Louisiana and Federal Air Quality Requirements

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31

Agency Interest No.: 1432

**Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter		NSPS 40 CFR 60		NESHAP 40 CFR 61		NESHAP 40 CFR 63		40 CFR
		1	2	3	4	5	6	7	8	
EQT0110	L02009 – D High Density Storage Chest – West									
EQT0111	L02010 – D High Density Storage Chest – East									
EQT0112	L02011 – D High Density Storage Chest									
EQT0113	L02012 – Transition High Density Storage Chest									
EQT0114	L02013 – Semi-Chem High Density Storage									
EQT0116	L02015 – D Decker & Filtrate Chest									2
EQT0120	L02019 – A/B Black Liquor Filter #1									
EQT0121	L02020 – A/B Black Liquor Filter #2									
EQT0122	L02021 – D Liquor Filter									
EQT0128	L02027 – S-C Blow Tank									2
EQT0135	L03001 – No. 1 Foster Wheeler Boiler	1	2	2	3	1		2	3	2
EQT0136	L03002 – No. 2 Foster Wheeler Boiler	1	2	2	3	1		2	3	2
EQT0137	L03003 – Bark Boiler	1	1	1	1	1	1	1	3	2
EQT0138	L03004 – No. 4 Recovery Boiler	1		2	1	1		3	3	2
EQT0139	L03005 – No. 4 Recovery Boiler	1		2	1	1		3	3	2
EQT0140	L03006 – No. 4 Recovery Boiler Smelt Dissolving Tank			2	3	1	1	1	1	2

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31
Agency Interest No.: 1432
Graphic Packaging Internation
West Monroe, Ouachita Parish, La.

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31

Agency Interest No.: 1432

**Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana**

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31

Agency Interest No.: 1432

Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III Chapter										NSPS 40 CFR 60										NESHAP 40 CFR 61										40 CFR										
		5	2	509	9	13	15	17	21	23*	29*	31*	33*	36	39*	A	D	D _g	D _a	K _a	K _b	B ₂	B ₃	A	M	S	O	A	M	JJJ	ZZZ	Z	82	70	68	64	62	52	40	CFR		
EQT0173	L04010 – Dregs Filter Vacuum Pump																																									
EQT0174	L05001 – Paper Machine No. 1																																									
EQT0175	L05002 – Paper Machine No. 2																																									
EQT0176	L05002B – Paper Machine No. 2 – coating																																									
EQT0177	L05003 – Paper Machine No. 5																																									
EQT0178	L05004 – Paper Machine No. 6 – coating																																									
EQT0179	L05004B – Paper Machine No. 6 – coating																																									
EQT0180	L05005 – Paper Machine No. 7																																									
EQT0181	L05005B – Paper Machine No. 7 – coating																																									
EQT0182	L06001 – Dry End Starch Silos																																									
EQT0183	L06002 – Wet End Hopper																																									
EQT0184	L06003 – Wet End Starch Silo																																									
EQT0185	L06004 – Casein Silo																																									
EQT0186	L06005 – PVOH/Protein/Casein Hopper																																									
EQT0187	L06006 – Protein Silo																																									
EQT0188	L06007 – Soda Ash Hoppers																																									
EQT0189	L06008 – Coatings & Additives Systems Area Source																																									

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

West Monroe Mill #31

Agency Interest No.: 1432

Graphic Packaging International Inc
West Monroe, Ouachita Parish, Louisiana

X. Table 1. Applicable Louisiana and Federal Air Quality Requirements

ID No.:	Description	LAC 33:III, Chapter												NSPS 40 CFR 60												NESHAP 40 CFR 61												NESHAP 40 CFR 63												40 CFR																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																																					
509	51	52	53*	54*	55*	56	57*	58*	59*	60	61	62	63	64	65	66	67	68	69	70	71	72	73	74	75	76	77	78	79	80	81	82	83	84	85	86	87	88	89	90	91	92	93	94	95	96	97	98	99	100	101	102	103	104	105	106	107	108	109	110	111	112	113	114	115	116	117	118	119	120	121	122	123	124	125	126	127	128	129	130	131	132	133	134	135	136	137	138	139	140	141	142	143	144	145	146	147	148	149	150	151	152	153	154	155	156	157	158	159	160	161	162	163	164	165	166	167	168	169	170	171	172	173	174	175	176	177	178	179	180	181	182	183	184	185	186	187	188	189	190	191	192	193	194	195	196	197	198	199	200	201	202	203	204	205	206	207	208	209	210	211	212	213	214	215	216	217	218	219	220	221	222	223	224	225	226	227	228	229	230	231	232	233	234	235	236	237	238	239	240	241	242	243	244	245	246	247	248	249	250	251	252	253	254	255	256	257	258	259	260	261	262	263	264	265	266	267	268	269	270	271	272	273	274	275	276	277	278	279	280	281	282	283	284	285	286	287	288	289	290	291	292	293	294	295	296	297	298	299	300	301	302	303	304	305	306	307	308	309	310	311	312	313	314	315	316	317	318	319	320	321	322	323	324	325	326	327	328	329	330	331	332	333	334	335	336	337	338	339	340	341	342	343	344	345	346	347	348	349	350	351	352	353	354	355	356	357	358	359	360	361	362	363	364	365	366	367	368	369	370	371	372	373	374	375	376	377	378	379	380	381	382	383	384	385	386	387	388	389	390	391	392	393	394	395	396	397	398	399	400	401	402	403	404	405	406	407	408	409	410	411	412	413	414	415	416	417	418	419	420	421	422	423	424	425	426	427	428	429	430	431	432	433	434	435	436	437	438	439	440	441	442	443	444	445	446	447	448	449	450	451	452	453	454	455	456	457	458	459	460	461	462	463	464	465	466	467	468	469	470	471	472	473	474	475	476	477	478	479	480	481	482	483	484	485	486	487	488	489	490	491	492	493	494	495	496	497	498	499	500	501	502	503	504	505	506	507	508	509	510	511	512	513	514	515	516	517	518	519	520	521	522	523	524	525	526	527	528	529	530	531	532	533	534	535	536	537	538	539	540	541	542	543	544	545	546	547	548	549	550	551	552	553	554	555	556	557	558	559	550	551	552	553	554	555	556	557	558	559	560	561	562	563	564	565	566	567	568	569	570	571	572	573	574	575	576	577	578	579	580	581	582	583	584	585	586	587	588	589	590	591	592	593	594	595	596	597	598	599	600	601	602	603	604	605	606	607	608	609	610	611	612	613	614	615	616	617	618	619	620	621	622	623	624	625	626	627	628	629	630	631	632	633	634	635	636	637	638	639	640	641	642	643	644	645	646	647	648	649	650	651	652	653	654	655	656	657	658	659	660	661	662	663	664	665	666	667	668	669	660	661	662	663	664	665	666	667	668	669	670	671	672	673	674	675	676	677	678	679	680	681	682	683	684	685	686	687	688	689	690	691	692	693	694	695	696	697	698	699	700	701	702	703	704	705	706	707	708	709	710	711	712	713	714	715	716	717	718	719	720	721	722	723	724	725	726	727	728	729	720	721	722	723	724	725	726	727	728	729	730	731	732	733	734	735	736	737	738	739	730	731	732	733	734	735	736	737	738	739	740	741	742	743	744	745	746	747	748	749	740	741	742	743	744	745	746	747	748	749	750	751	752	753	754	755	756	757	758	759	750	751	752	753	754	755	756	757	758	759	760	761	762	763	764	765	766	767	768	769	760	761	762	763	764	765	766	767	768	769	770	771	772	773	774	775	776	777	778	779	770	771	772	773	774	775	776	777	778	779	780	781	782	783	784	785	786	787	788	789	780	781	782	783	784	785	786	787	788	789	790	791	792	793	794	795	796	797	798	799	790	791	792	793	794	795	796	797	798	799	800	801	802	803	804	805	806	807	808	809	800	801	802	803	804	805	806	807	808	809	810	811	812	813	814	815	816	817	818	819	810	811	812	813	814	815	816	817	818	819	820	821	822	823	824	825	826	827	828	829	820	821	822	823	824	825	826	827	828	829	830	831	832	833	834	835	836	837	838	839	830	831	832	833	834	835	836	837	838	839	840	841	842	843	844	845	846	847	848	849	840	841	842	843	844	845	846	847	848	849	850	851	852	853	854	855	856	857	858	859	850	851	852	853	854	855	856	857	858	859	860	861	862	863	864	865	866	867	868	869	860	861	862	863	864	865	866	867	868	869	870	871	872	873	874	875	876	877	878	879	870	871	872	873	874	875	876	877	878	879	880	881	882	883	884	885	886	887	888	889	880	881	882	883	884	885	886	887	888	889	890	891	892	893	894	895	896	897	898	899	890	891	892	893	894	895	896	897	898	899	900	901	902	903	904	905	906	907	908	909	900	901	902	903	904	905	906	907	908	909	910	911	912	913	914	915	916	917	918	919	910	911	912	913	914	915	916	917	918	919	920	921	922	923	924	925	926	927	928	929	920	921	922	923	924	925	926	927	928	929	930	931	932	933	934	935	936	937	938	939	930	931	932	933	934	935	936	937	938	939	940	941	942	943	944	945	946	947	948	949	940	941	942	943	944	945	946	947	948	949	950	951	952	953	954	955	956	957	958	959	950	951	952	953	954	955	956	957	958	959	960	961	962	963	964	965	966	967	968	969	960	961	962	963	964	965	966	967	968	969	970	971	972	973	974	975	976	977	978	979	970	971	972	973	974	975	976	977	978	979	980	981	982	983	984	985	986	987	988	989	980	981	982	983	984	985	986	987	988	989	990	991	992	993	994	995	996	997	998	999	990	991	992	993	994	995	996	997	998	999	1000	1001	1002	1003	1004	1005	1006	1007	100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Agency Interest No.: 1432

Graphic Packaging International Inc

West Monroe, Ouachita Parish, Louisiana

KEY TO MATRIX

- 1 -The regulations have applicable requirements that apply to this particular emission source.
-The emission source may have an exemption from control stated in the regulation. The emission source may not have to be controlled but may have monitoring, recordkeeping, or reporting requirements.
- 2 -The regulations have applicable requirements that apply to this particular emission source but the source is currently exempt from these requirements due to meeting a specific criterion, such as it has not been constructed, modified or reconstructed since the regulations have been in place. If the specific criteria changes the source will have to comply at a future date.
- 3 -The regulations apply to this general type of emission source (i.e. vents, furnaces, towers, and fugitives) but do not apply to this particular emission source.

Blank -- The regulations clearly do not apply to this type of emission source.

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
UNF001 - West Monroe Mill # 31	Chemical Accident Prevention and Minimization of Consequences [LAC 33.III.Chapter 59]	DOES NOT APPLY. The facility does not emit any of the pollutants listed in Table 59.0. [LAC 33.III.5907.A]
EQT099, EQT0100, EQT0101	Emissions Standards for Particulate Matter [LAC 33:III.1301.B] Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.1]	EXEMPT. Wood pulping industry is exempt per LAC 33.III.1301.B. [LAC 33:III.1301.B]
ARE003, ARE004	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	DOES NOT APPLY. The cyclone operates as inherent process equipment. The cyclone on the chip bin is part of the process design feature of the pneumatic conveyance of chips. [40 CFR 64.1]
ARE006	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. Wood pulping industry is exempt per LAC 33.III.1301.B. [LAC 33:III.1301.B]
EQT0102, EQT0103, EQT0117, EQT0118, EQT0119, EQT0123, EQT0124, EQT0126, EQT0127, EQT0129, EQT0130, EQT0131, EQT0132, EQT0133, EQT0134, EQT0197	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP – Subpart S and therefore exempt from CAM requirements.[40 CFR 64.2(b)(1)(i)]
EQT0104	NSPS Subpart BB – Standards for Performance of Kraft Pulp Mills [40 CFR 60.280(a)] Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	DOES NOT APPLY. Diffusion Washer Systems are excluded from the list of affected facilities under NSPS – Subpart BB. [40 CFR 60.280(a)] EXEMPT. These sources are subject to NESHAP – Subpart S and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT0105, EQT0116, EQT0126, EQT0127, EQT0128, EQT0129, EQT0130, EQT0131, EQT0132, EQT0133, EQT0134	NSPS Subpart BB – Standards for Performance of Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. These sources have not been constructed or modified since September 24, 1976. [40 CFR 60.280(b)]
EQT0115	Storage of Volatile Organic Compounds [LAC 33:III.2103.A&B] NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)] NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)] NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110(b)(a)]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A&B] DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)] DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]
EQT0135, EQT0136	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0135, EQT0136 (continued)	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO ₂ emissions from the source. [LAC 33:III.1503.C]
	Waste Gas Disposal [LAC 33:III.2115]	DOES NOT APPLY. The vent gas from this combustion source is not classified as a waste gas stream. [LAC 33:III.2115.M]
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5105.B.3(a)&(b)]	EXEMPT. The requirements of LAC 33:III.Chapter 51 do not apply when the boilers are combusting Group 1 or Group 2 virgin fossil fuels. [LAC 33:III.5105.B.3(a)&(b)]
	NSPS Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 [40 CFR 60.40(c)]	EXEMPT. The boilers have not been constructed or modified after August 17, 1971. [40 CFR 60.40(c)]
	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boilers are not electric steam generating units. [40 CFR 60.40a(a)]
	NSPS Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. The boilers have not been constructed, reconstructed, or modified after June 19, 1984. [40 CFR 60.40b(a)]
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. The boilers have not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40c(a)]
EQT0137	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0137 (continued)	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boiler is not an electric steam generating unit. [40 CFR 60.40a(a)]
	NSPS Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 19, 1984. [40 CFR 60.40b(a)]
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40c(a)]
EQT0138, EQT0139	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:II.1301.B]
	NSPS Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 [40 CFR 60.40(c)]	DOES NOT APPLY. The boiler is not a fossil fuel-fired steam generating unit. Fossil fuel firing is necessary for proper black liquor combustion. Therefore the subpart is not applicable to the boiler as per memorandum from John S. Seltz, EPA, dated June 15, 1990. [40 CFR 60.40(c)]
	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40a(a)]	DOES NOT APPLY. The boiler is not an electric steam generating unit. [40 CFR 60.40a(a)]
	NSPS Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40b(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 19, 1984. [40 CFR 60.40b(a)]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0138, EQT0139 (continued)	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40c(a)] NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40c(a)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after September 24, 1976. [40 CFR 60.280(b)]
	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. These sources are subject to NESHAP – Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
EQT0140	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SC2 emissions from the source. [LAC 33:III.1503.C]
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	DOES NOT APPLY. Tank does not meet the definition of storage tank [LAC 33:III.2103.B]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after September 24, 1976. [40 CFR 60.280(b)]
EQT0141, EQT0142	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. This source is subject to NESHAP – Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
	Control of Emissions for Specific Industries: Subchapter A. Chemical Woodpulping Industry [LAC 33:III.2301.E]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B [LAC 33:III.1301.B]
		EXEMPT. Exempt from the total reduced sulfur and opacity limits because source is subject to 40 CFR 60, Subpart BB–Standards of Performance for Kraft Pulp Mills. [LAC 33:III.2301.E]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0141, EQT0142 (continued)	NSPS Subpart D – Standards of Performance for Fossil-Fuel-Fired Steam Generators for Which Construction Is Commenced After August 17, 1971 [40 CFR 60.40(c)]	DOES NOT APPLY. The boiler is not a fossil fuel-fired steam generating unit. Fossil fuel firing is necessary for proper black liquor combustion. Therefore the subpart is not applicable to the boiler as per memorandum from John S. Seltz, EPA, dated June 15, 1990. [40 CFR 60.40(c)]
	NSPS Subpart Da – Standards of Performance for Electric Utility Steam Generating Units for Which Construction is Commenced After September 18, 1978 [40 CFR 60.40(a)]	DOES NOT APPLY. The boiler is not an electric steam generating unit. [40 CFR 60.40(a)]
	NSPS Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units [40 CFR 60.40(c)(a)]	EXEMPT. The boiler has not been constructed, reconstructed, or modified after June 9, 1989. [40 CFR 60.40(a)(a)]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. These sources are subject to NESHAP – Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]
	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]
EQT0143	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	DOES NOT APPLY. Tank does not meet the definition of storage tank. [LAC 33:III.2103.B]
	Control of Emissions for Specific Industries: Subchapter A. Chemical Woodpulping Industry [LAC 33:III.2301]	EXEMPT. Exempt from the total reduced sulfur limits because source is subject to 40 CFR 60, Subpart BB–Standards of Performance for Kraft Pulp Mills. [LAC 33:III.2301.E]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(b)(1)(i)]	EXEMPT. This source is subject to NESHAP – Subpart MM and therefore exempt from CAM requirements. [40 CFR 64.2(b)(1)(i)]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT0144	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(a)(3)]	DOES NOT APPLY. The source does not emit pre-controlled emissions greater than 100 TPY. [40 CFR 64.2(a)(3)]
EQT0145, EQT0146, EQT0147, EQT0148, EQT0149, EQT0150, EQT0151, EQT0153, EQT0154, EQT0155, EQT0156, EQT0198, EQT0199	Storage of Volatile Organic Compounds [LAC 33:III.2.103.A &B] NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2.103.A&B]
EQT0157	NSPS Subpart Kb – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]
EQT0158	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. Tank has not been constructed, reconstructed, or modified after July 23, 1984. [40 CFR 60.110(a)]
EQT0159	Storage of Volatile Organic Compounds [LAC 33:III.2.103.A &B] NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2.103.A&B]
EQT0160		DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0157 (continued)	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110a(a)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. The vapor pressure of the tank contents is less than 3.5 kPa (0.51 psia). [40 CFR 60.110(a)]
	Storage of Volatile Organic Compounds [LAC 33:III.2103.A & B]	EXEMPT. Tank does not store volatile organic compounds with a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A&B]
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110(a)]
EQT0160, EQT0161, EQT0162	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Tank does not store petroleum liquids. [40 CFR 60.110a(a)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	EXEMPT. Tank has not been constructed, reconstructed, or modified after July 23, 1984. [40 CFR 60.110b(a)]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT0164	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
EQT0165, EQT0166	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]
	NSPS Subpart BB – Standards of Performance for Kraft Pulp Mills [40 CFR 60.280(b)]	EXEMPT. The lime kilns have not been constructed, reconstructed, or modified after September 24, 1976. [40 CFR 60.280(b)]
EQT0174, EQT0177	Organic Solvents [LAC 33:III.2123.C]	DOES NOT APPLY. These paper machines do not use organic solvents that are photochemically reactive as defined in LAC 33:III.2123.B.1. [LAC 33:III.2123.B.1]
EQT0175, EQT0178, EQT0180	Organic Solvents [LAC 33:III.2123.C]	DOES NOT APPLY. The materials used in the on-machine coating are not organic solvents because of the low VOC content of the water based mixture, which is well below the 20% threshold defined in LAC 33:III.2123.B.1 for organic solvents which are not considered photochemically reactive. The materials used in the on-machine coating is part of the substrate and therefore not considered surface coating of paper under LAC 33:III.2123.C.4. [LAC 33:III.2123.B.1&C.4]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0175, EQT0178, EQT0180 (continued)	NESHAP Subpart JJJ – Paper and Other Web Coating [40 CFR 63.3290]	DOES NOT APPLY. In a letter dated November 19, 2003, from Michael Alushin, Director of Compliance Assessment and Media Programs Division, the EPA determined that on-machine coaters that apply materials used to form a substrate (i.e. the paperboard) are not subject to NESHAP Subpart JJJ. GPI's uses water based clays, titanium dioxide, synthetic pigment, starch, and latex which were the materials reviewed by EPA in making this determination. [40 CFR 63.3290]
EQT0176, EQT0179, EQT0181	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO ₂ emissions from the source. [LAC 33:III.1503.C]
EQT0182, EQT0183, EQT0184, EQT0185, EQT0186, EQT0187	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
	Compliance Assurance Monitoring for Major Stationary Sources [40 CFR 64.2(a)(3)]	DOES NOT APPLY. The source does not emit pre-controlled emissions greater than 100 TPY. [40 CFR 64.2(a)(3)]
EQT0188	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
EQT0189	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0189 (continued)	Organic Solvents [LAC 33:III.2123.C]	DOES NOT APPLY. The materials used in the on-machine coating are not organic solvents because of the low VOC content of the water based mixture, which is well below the 20% threshold defined in LAC 33:III.2123.B.1 for organic solvents which are not considered photochemically reactive. This source makes the water based coating applied on the on-line coaters that is part of the substrate. [LAC 33:III.2123.B.1]
EQT0190	Limiting VOC Emissions From Industrial Wastewater [LAC 33:III.2153.C]	DOES NOT APPLY. Source is not located in one of the parishes affected by this regulation. [LAC 33:III.2153.A]
EQT0191, EQT0192, EQT0193, EQT0194	NESHAP Subpart Q – Industrial Process Cooling Towers [40 CFR 63.400(a)] Compliance Assurance Monitoring [40 CFR 64.1]	DOES NOT APPLY. Cooling towers do not use chromium based water treatment chemicals. [40 CFR 63.400(a)]
EQT0195	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)] NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	DOES NOT APPLY. Mist eliminators on the cooling towers are inherent process equipment and not control devices. DOES NOT APPLY. Storage capacity of tank is less than 40,000 gallons. [40 CFR 60.110(a)] DOES NOT APPLY. Storage capacity of tank is less than 40,000 gallons. [40 CFR 60.110a(a)]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No:	Requirement	Notes
EQT0195 (continued)	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	DOES NOT APPLY. Storage capacity of tank is less than 75 m ³ . [40 CFR 60.110b(a)]
EQT0196	Storage of Volatile Organic Compounds [LAC 33:III.2103.B]	EXEMPT. Storage tank does not contain any volatile organic compound having a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.B]
EQT0196	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	EXEMPT. The tank has not been constructed , reconstructed or modified after June 11, 1973 and prior to May 19, 1978. [40 CFR 60.110(a)]
EQT0201	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110a(a)]	EXEMPT. The tank has not been constructed , reconstructed or modified after May 18, 1978 and prior to July 23, 1984. [40 CFR 60.110a(a)]
EQT0201	Emissions Standards for Particulate Matter [LAC 33:III.1301.B]	EXEMPT. Wood pulping industry is exempt per LAC 33:III.1301.B. [LAC 33:III.1301.B]
EQT0201	Emission Standards for Sulfur Dioxide [LAC 33:III.1513.C]	EXEMPT. Because the source is not subject to the limitations of LAC 33:III.1503.C, the permittee shall record and retain at the site sufficient data to show the annual SO2 emissions from the source. [LAC 33:III.1503.C]

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X. Table 2. Explanation for Exemption Status or Non-Applicability of a Source

ID No.	Requirement	Notes
EQT0201 (continued)	NESHAP Subpart ZZZZ - National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [40 CFR 63.6590(a)(1)(ii)]	EXEPMT. The temporary compressors are existing compression ignition stationary RICE with site-ratings lower than 500 bhp and were constructed or reconstructed before July 12, 2006. [40 CFR 63.6590(a)(1)(ii)]
	NSPS Subpart III – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines	EXEMPT. Engines have not been modified or reconstructed after July 11, 2005 [40 CFR 63.4200(a)(3)]
	Storage of Volatile Organic Compounds [LAC 33:III.2103.A]	EXEMPT. Storage tank does not contain any volatile organic compound having a true vapor pressure of 1.5 psia or greater. [LAC 33:III.2103.A]
	NSPS Subpart K – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After June 11, 1973, and Prior to May 19, 1978 [40 CFR 60.110(a)]	EXEMPT. The tank has not been constructed , reconstructed or modified after June 11, 1973 and prior to May 19, 1978. [40 CFR 60.110(a)]
EQT0203	NSPS Subpart Ka – Standards of Performance for Storage Vessels for Petroleum Liquids for Which Construction, Reconstruction, or Modification Commenced After May 18, 1978, and Prior to July 23, 1984 [40 CFR 60.110(a)]	EXEMPT. The tank has not been constructed , reconstructed or modified after May 18, 1978 and prior to July 23, 1984. [40 CFR 60.110(a)]
	NSPS Subpart Kb – Standards of Performance for Volatile Organic Liquid Storage Vessels (Including Petroleum Liquid Storage Vessels) for Which Construction, Reconstruction, or Modification Commenced After July 23, 1984 [40 CFR 60.110b(a)]	DOES NOT APPLY. The tank has a storage capacity greater than 151m ³ (39, 889.98 gallons), but does not store a liquid with a maximum true vapor pressure less than 3.5 kPa (0.5 psia). Pursuant to Vol. 68, No.199 published October 15, 2003 of Fed. Reg. 592329, the Environmental Protection Agency (EPA) exempted storage vessels with a capacity equal to or greater than 151m ³ storing liquid with vapor pressure less than 3.5 kPa from the recordkeeping requirements of subpart Kb.

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The above table provides explanation for either the exemption status or non-applicability of a source cited by 1, 2 or 3 in the matrix presented in Section X (Table 1) of this permit.

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- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]
- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
 1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and

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4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]

I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]

J. Records of required monitoring shall include the following:

1. the date, place as defined in the permit, and time of sampling or measurements;
2. the date(s) analyses were performed;
3. the company or entity that performed the analyses;
4. the analytical techniques or methods used;
5. the results of such analyses; and
6. the operating conditions as existing at the time of sampling or measurement.

[Reference 40 CFR 70.6(a)(3)(ii)(A)]

K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]

L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]

M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an

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emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]

- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
 1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible official in accordance with 40 CFR 70.5(d).
 1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
 2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
 3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a

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written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:

- a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]
- S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]
- T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:
- 1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
 - 2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
 - 3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
 - 4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as defined at 40 CFR 82.152);
 - 5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
 - 6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

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- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated June 15, 2007, along with supplemental information dated July 24, 2007, August 15, 2007, September 7, 2007, September 24, 2007, October 5, 2007, October 22, 2007, December 19, 2007, January, 23, 2008, February 13, 2008, February 18, 2008, February 25, 2008, February 27, 2008, and April 10, 2008.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

LOUISIANA AIR EMISSION PERMIT GENERAL CONDITIONS

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
2. Report by September 30 to cover April through June
3. Report by December 31 to cover July through September
4. Report by March 31 to cover October through December

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- D. Each report submitted in accordance with this condition shall contain the following information:
1. Description of noncomplying emission(s);
 2. Cause of noncompliance;
 3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
 4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
 5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.
- E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.
- XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:
- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
 - B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
 - C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
 - D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.
- XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.
- XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.
- XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.
- XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:
1. Generally be less than 5 TPY
 2. Be less than the minimum emission rate (MER)
 3. Be scheduled daily, weekly, monthly, etc., or
 4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]
- These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.
- XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

- XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

General Information

AI ID: 1432 Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Also Known As:	ID	Name	User Group	Start Date
	2160-00001	Graphic Packaging International Inc - West Monroe Mill	CDS Number	08-05-2002
84-0772929		Federal Tax ID #	Federal Tax ID	12-04-2000
LAD008193567		Riverwood International Corp	Hazardous Waste Notification	03-03-2000
LA0007617		LPDES #	LPDES Permit #	05-22-2003
LAR05N463		LPDES #	LPDES Permit #	08-08-2004
WP1932		LWDPSS #	LWDPSS Permit #	06-25-2003
Olin Matheson Chemical Corp - Plant #31		Olin Matheson Chemical Corp - Plant #31	Multimedia	04-01-1959
Graphic Packaging International Inc - Plant #31		Graphic Packaging International Inc - Plant #31	Multimedia	08-08-2003
Priority 1 Emergency Site		Priority 1 Emergency Site	Priority 1 Emergency Site	07-18-2006
Radioactive Material License		Radioactive Material License	Radiation License Number	12-04-2000
X-Ray Registration Number		X-Ray Registration Number	Radiation X-ray Registration Number	07-09-2003
Site ID #		Site ID #	Solid Waste Facility No.	04-30-2001
10817		Manville Forest Products Corp	TEMPO Merge	12-14-2000
GD-073-0405		Riverwood International Corp	TEMPO Merge	08-12-2001
17532		TRI #	Toxic Release Inventory	07-09-2004
38792		UST Facility ID (from UST legacy data)	UST FID #	10-11-2002
71294MNVL1000J		West Monroe Fibre Processing Inc	Water Permitting	08-31-2000
37006197				
			Main Phone:	3183622000
		1000 Jonesboro Rd (portion of) West Monroe, LA 71292		
		PO Box 35800 West Monroe, LA 712945800		
		Location of Front Gate: 32° 29' 11" 51 hundredths latitude, 92° 9' 1" 45 hundredths longitude, Coordinate Method: GPS Code (Psuedo Range) Differential, Coordinate Datum: NAD83		
Related People:	Name	Mailing Address	Phone (Type)	Relationship
	Jim Atkinson	PO Box 35800 West Monroe, LA 712945800	3183622000 (WP)	Radiation Contact For
	Cindy Brown	PO Box 35800 West Monroe, LA 712945800	3183622612 (WP)	Accident Prevention Contact for
	Cindy Brown	PO Box 35800 West Monroe, LA 712945800	browncl@graphicpk	Accident Prevention Contact for
	Tony Hobson	PO Box 35800 West Monroe, LA 712945800	3183622000 (WP)	Responsible Official for
	Tony Hobson	PO Box 35800 West Monroe, LA 712945800	tony.hobson@graphic	Responsible Official for
	James Hollingsworth	PO Box 35800 West Monroe, LA 712945800	3183622195 (WP)	Radiation Safety Officer for
	James Hollingsworth	PO Box 35800 West Monroe, LA 712945800	3183622055 (WF)	Radiation Safety Officer for
	James Hollingsworth	PO Box 35800 West Monroe, LA 712945800	jim.hollingsworth@gi	Radiation Safety Officer for
	Stephen Monvant	PO Box 35800 West Monroe, LA 712945800	3183622917 (WP)	Air Permit Contact For

General Information

AI ID: 1432 Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Related People:	Name	Mailing Address	Phone (Type)	Relationship
Stephen Marrant	Stephen Marrant	PO Box 35800 West Monroe, LA 712945800	3183622111 (WF)	Air Permit Contact For
Stephen Marrant	Stephen Marrant	PO Box 35800 West Monroe, LA 712945800	3183622917 (WP)	Emission Inventory Contact for
Stephen Marrant	Stephen Marrant	PO Box 35800 West Monroe, LA 712945800	STEVE.MORVANT@gra	Emission Inventory Contact for
Stephen Marrant	Stephen Marrant	PO Box 35800 West Monroe, LA 712945800	3183622111 (WF)	Emission Inventory Contact for
Stephen Marrant	Stephen Marrant	PO Box 35800 West Monroe, LA 712945800	STEVE.MORVANT@gra	Air Permit Contact For
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	3183622759 (WP)	Underground Storage Tank Contact for
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	elizabeth.smith@gra	Underground Storage Tank Contact for
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	elizabeth.smith@gra	Solid Waste Billing Party for
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	3183622759 (WP)	Solid Waste Billing Party for
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	elizabeth.smith@gra	Water Billing Party for
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	3183622759 (WP)	Water Billing Party for
Elizabeth Smith	Elizabeth Smith	PO Box 35800 West Monroe, LA 712945800	3183622759 (WP)	Water Billing Party for
Related Organizations:	Name	Address	Phone (Type)	Relationship
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Accident Prevention Billing Party for
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Owns
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Operates
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Radiation License Billing Party for
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Emission Inventory Billing Party
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Radiation Registration Billing Party for
Graphic Packaging International Inc	Graphic Packaging International Inc	Station 12 West Monroe, LA 712945800	3183622730 (WP)	Air Billing Party for
Riverwood International USA Inc	Riverwood International USA Inc	PO Box 35800 West Monroe, LA 71294	3183622142 (WP)	Agent of Service for

Note: This report entitled "General Information" contains a summary of facility-level information contained in LDEQ's TEMPO database for this facility and is not considered a part of the permit. Please review the information contained in this document for accuracy and completeness. If any changes are required or if you have questions regarding this document, you may contact Mr. David Ferrand, Environmental Assistance Division, at (225) 219-3247 or email your changes to facupdate@la.gov.

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
HVLC Sources						
EQT0102	L02001 - A Digester Brownstock Washer System			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0103	L02002 - B Digester Brownstock Washer System			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0104	L02003 - D Digester Diffusion Washer System			292800 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0117	L02016 - A Rejects Tank	8225 gallons				8760 hr/yr (All Year)
EQT0118	L02017 - A/B Rejects Feed Tank	34261 gallons				8760 hr/yr (All Year)
EQT0119	L02018 - B Rejects Tank	8225 gallons				8760 hr/yr (All Year)
EQT0123	L02022 - D Surge Tank	28831 gallons				8760 hr/yr (All Year)
EQT0124	L02023 - D Unscreened Stock Tank, Refined Chest, Primary Rejects Chest					8760 hr/yr (All Year)
EQT0197	L02034 - "B" Refiner Rejects Tank					8760 hr/yr (All Year)
L09005 - Pulping Condensates						
EQT0102	L02001 - A Digester Brownstock Washer System			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0103	L02002 - B Digester Brownstock Washer System			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0104	L02003 - D Digester Diffusion Washer System			292800 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0117	L02016 - A Rejects Tank	8225 gallons				8760 hr/yr (All Year)
EQT0118	L02017 - A/B Rejects Feed Tank	34261 gallons				8760 hr/yr (All Year)
EQT0119	L02018 - B Rejects Tank	8225 gallons				8760 hr/yr (All Year)
EQT0123	L02022 - D Surge Tank	28831 gallons				8760 hr/yr (All Year)
EQT0124	L02023 - D Unscreened Stock Tank, Refined Chest, Primary Rejects Chest					8760 hr/yr (All Year)
EQT0126	L02025 - A Blow Tank			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0127	L02026 - B Blow Tank			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0129	L02028 - A Digester System			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0130	L02029 - B Digester System			274500 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0131	L02030 - D Digester System			292800 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0132	L02031 - Semi-Chem Digester System			105840 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0133	L02032 - Evaporator Off Gases	108.7 Bone Dry Tons Pulp/hr	947640 Bone Dry Tons Pulp/yr			8760 hr/yr (All Year)
EQT0134	L02033 - D Digester Chip Bin			292800 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0197	L02034 - "B" Refiner Rejects Tank					8760 hr/yr (All Year)

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
LVHC Sources						
EQT0126	L02025 - A Blow Tank		274500	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0127	L02026 - B Blow Tank		274500	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0129	L02028 - A Digester System		274500	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0130	L02029 - B Digester System		274500	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0131	L02030 - D Digester System		292800	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0132	L02031 - Semi-Chem Digester System		105840	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0133	L02032 - Evaporator Off Gases	108.7	947640	Bone Dry Tons Pulp/hr		8760 hr/yr (All Year)
EQT0134	L02033 - D Digester Chip Bin		292800	Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
West Monroe Mill # 31						
ARE0003	L01004 - Chip Piles		494 tons/hr	3.78 MM tons/yr		8760 hr/yr (All Year)
ARE0004	L01005 - Unpaved Roads			26575 vehicle miles traveled/yr		8760 hr/yr (All Year)
ARE0006	L09007 - Closed Vent System					8760 hr/yr (All Year)
EQT0059	L01001 - Semi-Chem Chip Bin Cyclone		19000 ft^3/min (actual)			8760 hr/yr (All Year)
EQT0100	L01002 - Chipper Cyclone Vent		17000 ft^3/min (actual)			8760 hr/yr (All Year)
EQT0101	L01003 - Rechipper Cyclone Vent		5000 ft^3/min (actual)			8760 hr/yr (All Year)
EQT0105	L02004 - Semi-Chem Brownstock Washer System		12.6 Bone Dry Tons Pulp/hr	105840 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0107	L02006 - South "A" High Density Storage	370000 gallons				8760 hr/yr (All Year)
EQT0108	L02007 - North "B" High Density Storage	370000 gallons				8760 hr/yr (All Year)
EQT0109	L02008 - South "B" High Density Storage	370000 gallons				8760 hr/yr (All Year)
EQT0110	L02009 - D High Density Storage Chest: West	370000 gallons				8760 hr/yr (All Year)
EQT0111	L02010 - D High Density Storage Chest: East	370000 gallons				8760 hr/yr (All Year)
EQT0112	L02011 - D High Density Storage Chest	370000 gallons.				8760 hr/yr (All Year)
EQT0113	L02012 - Transition High Density Storage Chest	370000 gallons				8760 hr/yr (All Year)
EQT0114	L02013 - Semi-Chem High Density Storage	370000 gallons				8760 hr/yr (All Year)
EQT0115	L02014 - Brown Liquor Transfer Tank	2538 gallons	33.42 Bone Dry Tons Pulp/hr	292800 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0116	L02015 - D Becker & Filtrate Chest					8760 hr/yr (All Year)
EQT0120	L02019 - A/B Black Liquor Filter #1					8760 hr/yr (All Year)
EQT0121	L02020 - A/B Black Liquor Filter #2					8760 hr/yr (All Year)
EQT0122	L02021 - D Liquor Filter					8760 hr/yr (All Year)
EQT0125	L02024 - Liquid Blend Tank		6.86 tons/hr	32340 tons/yr	CaO	8760 hr/yr (All Year)
EQT0128	L02027 - S-C Blow Tank		12.6 Bone Dry Tons Pulp/hr	105840 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
EQT0135	L03001 - No. 1 Foster Wheeler Boiler		470 MM BTU/hr	4117.2 billion BTU/yr		8760 hr/yr (All Year)
EQT0136	L03002 - No. 2 Foster Wheeler Boiler		470 MM BTU/hr	470 MM BTU/hr		8760 hr/yr (All Year)
EQT0137	L03003 - Bark Boiler		860 MM BTU/hr	7533 billion BTU/yr		8760 hr/yr (All Year)
EQT0138	L03004 - No. 4 Recovery Boiler Stack A		60 Tons black liquor solids/hr	502000 Tons black liquor solids/hr		8760 hr/yr (All Year)
EQT0139	L03005 - No. 4 Recovery Boiler Stack B		60 Tons black liquor solids/hr	502000 Tons black liquor solids/hr		8760 hr/yr (All Year)
EQT0140	L03006 - No. 4 Recovery Boiler Smelt Dissolving Tank		60 Tons black liquor solids/hr	502000 Tons black liquor solids/hr		8760 hr/yr (All Year)
EQT0141	L03007 - No. 5 Recovery Boiler Stack A		55 Tons black liquor solids/hr	462000 Tons black liquor solids/hr		8760 hr/yr (All Year)
EQT0142	L03008 - No. 5 Recovery Boiler Stack B		55 Tons black liquor solids/hr	462000 Tons black liquor solids/hr		8760 hr/yr (All Year)
EQT0143	L03009 - No. 5 Recovery Boiler Smelt Dissolving Tank		55 Tons black liquor solids/hr	462000 Tons black liquor solids/hr		8760 hr/yr (All Year)
EQT0144	L03010 - Tall Oil Reactor		6 tons/hr	25200 tons/yr		8760 hr/yr (All Year)
EQT0145	L03011 - #1 Weak Black Liquor Tank			470200 gallons		8760 hr/yr (All Year)

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
West Monroe Mill # 31						
EQT0146	L03012 - #2 Weak Black Liquor Tank	470200 gallons				8760 hr/yr (All Year)
EQT0147	L03013 - #3 Weak Black Liquor Tank	470200 gallons				8760 hr/yr (All Year)
EQT0148	L03014 - #1 Farm Tank	128968 gallons				8760 hr/yr (All Year)
EQT0149	L03015 - #5 Farm Tank	287880 gallons				8760 hr/yr (All Year)
EQT0150	L03016 - #4 White/Black Liquor Tank	215910 gallons				8760 hr/yr (All Year)
EQT0151	L03017 - DiSemi-Chem Weak Black Liquor Storage	470200 gallons				8760 hr/yr (All Year)
EQT0153	L03019 - East 52% Black Liquor Storage Tank	148064 gallons				8760 hr/yr (All Year)
EQT0154	L03020 - West 52% Black Liquor Storage Tank	128968 gallons				8760 hr/yr (All Year)
EQT0155	L03021 - #8 Black Liquor Tank	26785.7 bbl				8760 hr/yr (All Year)
EQT0156	L03022 - 68%/65% Black Liquor Storage - Tank 1	118068 gallons				8760 hr/yr (All Year)
EQT0157	L03023 - 68%/65% Black Liquor Storage - Tank 2	134595 gallons				8760 hr/yr (All Year)
EQT0160	L03026 - Tall Oil Settling Tank #1	3 tons/hr	12600 tons/yr		tall oil	8760 hr/yr (All Year)
EQT0161	L03027 - Tall Oil Settling Tank #2	3 tons/hr	12600 tons/yr		tall oil	8760 hr/yr (All Year)
EQT0162	L03028 - Tall Oil Storage Tank	6 tons/hr	25200 tons/yr		tall oil	8760 hr/yr (All Year)
EQT0163	L03029 - Brine Storage Tank	6 tons/hr	25200 tons/yr		tall oil	8760 hr/yr (All Year)
EQT0164	L04001 - Slaker and Lime Silo Scrubber	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0165	L04002 - Lime Kiln No. 1	15.77 tons/hr	138.15 tons/yr		Cao	8760 hr/yr (All Year)
EQT0166	L04003 - Lime Kiln No. 2	15.77 tons/hr	138.15 tons/yr		Cao	8760 hr/yr (All Year)
EQT0167	L04004 - Green Liquor Storage	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0168	L04005 - Line 1/2 Causticizers	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0169	L04006 - Line 1/2 White Liquor Filters	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0170	L04007 - Line 1/2 Precoat Filters	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0171	L04008 - Line 1/2 Precoat Filter Vacuum Pumps	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0172	L04009 - Dregs Filter	31.54 tons/hr	276290 tons/yr		Cao	8760 hr/yr (All Year)
EQT0173	L04010 - Dregs Filter Vacuum Pump	25 tons/hr	219000 tons/yr		air dried paper	8760 hr/yr (All Year)
EQT0174	L05001 - Paper Machine No. 1	18 tons/hr	157680 tons/yr		air dried paper	8760 hr/yr (All Year)
EQT0175	L05002 - Paper Machine No. 2	12 MM BTU/hr	105120 MM BTU/yr		air dried paper	8760 hr/yr (All Year)
EQT0176	L05002B - Paper Machine No. 2 - coating	6.7 tons/hr	586592 tons/yr		air dried paper	8760 hr/yr (All Year)
EQT0177	L05003 - Paper Machine No. 5	60 tons/hr	525600 tons/yr		air dried paper	8760 hr/yr (All Year)
EQT0178	L05004 - Paper Machine No. 6	38 MM BTU/hr	332880 MM BTU/yr		air dried paper	8760 hr/yr (All Year)
EQT0179	L05004B - Paper Machine No. 6 - coating	50 tons/hr	438000 tons/yr		air dried paper	8760 hr/yr (All Year)
EQT0180	L05005 - Paper Machine No. 7	45 MM BTU/hr	394200 MM BTU/yr		air dried paper	8760 hr/yr (All Year)
EQT0181	L06001 - Dry End Starch Silos	400000 lb	3000 lb			8760 hr/yr (All Year)
EQT0182	L06001 - Wet End Hopper					8760 hr/yr (All Year)
EQT0183	L06002 - Wet End Starch Silo					8760 hr/yr (All Year)
EQT0184	L06003 - Wet End Starch Silo					8760 hr/yr (All Year)
EQT0185	L06004 - Casein Silo					8760 hr/yr (All Year)
EQT0186	L06005 - PVOPH/Protein/Casein Hopper					8760 hr/yr (All Year)
EQT0187	L06006 - Protein Silo					8760 hr/yr (All Year)
EQT0188	L06007 - Soda Ash Hoppers		.12 tons/hr	1056 tons/yr		8760 hr/yr (All Year)

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Subject Item Inventory:

ID	Description	Tank Volume	Max. Operating Rate	Normal Operating Rate	Contents	Operating Time
West Monroe Mill # 31						
EQT0189	L06008 - Coatings & Additives System		121 Air-dried tons pulp/hr	1.05 MM Air-dried tons pulp/yr		8760 hr/yr (All Year)
EQT0190	L07001 - Wastewater Treatment System					8760 hr/yr (All Year)
EQT0191	L08001 - #7 Paper Machine Cooling Tower		.25 MM gallons/hr	2145.8 MM gallons/yr		8760 hr/yr (All Year)
EQT0192	L08002 - #1 Cooling Tower		1.68 MM gallons/hr	14717 MM gallons/yr		8760 hr/yr (All Year)
EQT0193	L08003 - #2 Cooling Tower		1.46 MM gallons/hr	12772 MM gallons/yr		8760 hr/yr (All Year)
EQT0194	L08004 - #3 Cooling Tower		900000 gallons/hr	7884 MM gallons/yr		8760 hr/yr (All Year)
EQT0195	L09003 - Gasoline Storage Tank - Storeroom		2000 gallons			8760 hr/yr (All Year)
EQT0196	L09004 - Wei-Strength Resin Tank		30000 gallons			8760 hr/yr (All Year)
EQT0198	L03030 - Barometric Condenser Supply Tank		387763 gallons			8760 hr/yr (All Year)
EQT0199	L03031 - Evap Weak Black Liquor Reclaim Tank SE		128722 gallons			8760 hr/yr (All Year)
EQT0200	L09006 - No. 3 and No. 5 Hotwells					8760 hr/yr (All Year)
EQT0201	L09008 - Temporary Compressors					4380 hr/yr (All Year)
EQT0203	L09010 - Recycle Oil Storage Tank		400000 gallons			8760 hr/yr (All Year)
EQT0204	L09011 - Mill Water Treatment Clarifier					8760 hr/yr (All Year)
EQT0206	L03024 - No. 4 Salt Cake Mix Tank					8760 hr/yr (All Year)
EQT0207	L03025 - No. 5 Salt Cake Mix Tank					8760 hr/yr (All Year)
FUG0005	L09001 - OCC Plant Fugitives		9.9 Bone Dry Tons Pulp/hr	86724 Bone Dry Tons Pulp/yr		8760 hr/yr (All Year)
FUG0006	L09002 - Secondary Fiber Plant Fugitives		11 Air-dried tons pulp/hr	96360 Air-dried tons pulp/yr		8760 hr/yr (All Year)

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
HVLC Sources							
EQT0102	L02001 - A Digester Brownstock Washer System	14037	4			66.01	109
EQT0103	L02002 - B Digester Brownstock Washer System	14037	4			66.01	109
EQT0104	L02003 - D Digester Diffusion Washer System	197.5	4			108	180
EQT0117	L02016 - A Rejects Tank			10			
EQT0118	L02017 - A/B Rejects Feed Tank			1			18
EQT0119	L02018 - B Rejects Tank			10			
EQT0123	L02022 - D Surge Tank			6			40
EQT0124	L02023 - D Unscreened Stock Tank, Refined Chest, Primary Rejects Chest			1.3			20
L09005 - Pulping Condensates							
EQT0102	L02001 - A Digester Brownstock Washer System	14037	4			66.01	109
EQT0103	L02002 - B Digester Brownstock Washer System	14037	4			66.01	109
EQT0104	L02003 - D Digester Diffusion Washer System	197.5	4			108	180

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
LO9805 - Pulping Condensates							
EQT0117	L02016 - A Rejects Tank			10		10	
EQT0118	L02017 - A/B Rejects Feed Tank			1		18	
EQT0119	L02018 - B Rejects Tank			10			
EQT0123	L02022 - D Surge Tank			6		40	
EQT0124	L02023 - D Unscreened Stock Tank, Refined Chest, Primary Rejects Chest			1.3		20	
EQT0127	L02026 - B Blow Tank					160	
LVHC Sources							
EQT0127	L02026 - B Blow Tank					160	
West Monroe Mill # 31							
EQT0099	L01001 - Semi-Chem Chip Bin Cyclone	11.2	18992	6		99.02	86
EQT0100	L01002 - Chipper Cyclone Vent	90.2	16994	2		36.52	86
EQT0101	L01003 - Rechipper Cyclone Vent	2.95	5000	6		61.81	86
EQT0105	L02004 - Semi-Chem Brownstock Washer System	6.1	1787	2.49		62.01	109
EQT0107	L02006 - South "A" High Density Storage			2.49			
EQT0108	L02007 - North "B" High Density Storage			1.35		79.99	
EQT0109	L02008 - South "B" High Density Storage			1.35		79.99	
EQT0110	L02009 - D High Density Storage Chest - West			2		84	
EQT0111	L02010 - D High Density Storage Chest - East			2		84	
EQT0112	L02011 - D High Density Storage Chest			.82		25.98	
EQT0113	L02012 - Transition High Density Storage Chest			2		56	
EQT0114	L02013 - Semi-Chem High Density Storage			.82		25.98	
EQT0115	L02014 - Brown Liquor Transfer Tank			.16		10.01	
EQT0116	L02015 - D Decker & Filterate Chest			1.6		10	
EQT0120	L02019 - A/B Black Liquor Filter #1			.67		115	
EQT0121	L02020 - A/B Black Liquor Filter #2			.67		115	
EQT0122	L02021 - D Liquor Filter			.67		50	
EQT0125	L02024 - Liquid Blend Tank			1		20	
EQT0135	L03001 - No. 1 Foster Wheeler Boiler	56.56	215277	8.99		114.01	350
EQT0136	L03002 - No. 2 Foster Wheeler Boiler	56.56	215277	8.99		175.98	350
EQT0137	L03003 - Bark Boiler	73.62	541792	12.5		150.98	140
EQT0138	L03004 - No. 4 Recovery Boiler Stack A	102.53	272572	7.51		176.05	433
EQT0139	L03005 - No. 4 Recovery Boiler Stack B	102.53	272572	7.51		176.05	433
EQT0140	L03006 - No. 4 Recovery Boiler Smet Dissolving Tank	40.72	58257	5.51		176.05	170

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
West Monroe Mill # 31							
EQT0141	L03007 - No. 5 Recovery Boiler Stack A	64.44	143306	6.99		198.55	432
EQT0142	L03008 - No. 5 Recovery Boiler Stack B	64.44	143306	6.99		198.55	432
EQT0143	L03009 - No. 5 Recovery Boiler Smet Dissolving Tank	17.49	25021	5.51		198.55	170
EQT0144	L03010 - Tall Oil Reactor	83.23	2637	.82		34.02	145
EQT0145	L03011 - #1 Weak Black Liquor Tank			.67			53
EQT0146	L03012 - #2 Weak Black Liquor Tank			.67			53
EQT0147	L03013 - #3 Weak Black Liquor Tank			.67			53
EQT0148	L03014 - #1 Farm Tank			.5			25
EQT0149	L03015 - #5 Farm Tank						40
EQT0150	L03016 - #4 White/Black Liquor Tank						30
EQT0151	L03017 - Disemi-Chem Weak Black Liquor Storage	.5	23			50	100
EQT0153	L03019 - East-52% Black Liquor Storage Tank	.5	10			28	100
EQT0154	L03020 - West-52% Black Liquor Storage Tank	.5	10			26	100
EQT0155	L03021 - #6 Black Liquor Tank						40
EQT0156	L03022 - 68%/65% Black Liquor Storage - Tank 1	.17	18			32	154
EQT0157	L03023 - 68%/65% Black Liquor Storage - Tank 2	.17	18			29	154
EQT0160	L03026 - Tall Oil Settling Tank #1						14
EQT0161	L03027 - Tall Oil Settling Tank #2						14
EQT0162	L03028 - Tall Oil Storage Tank						30
EQT0163	L03029 - Brine Storage Tank						17
EQT0164	L04001 - Slaker and Lime Silo Scrubber	25.64	13000	3.28		23	165
EQT0165	L04002 - Lime Kiln No. 1	33.6	57038	6		97.83	169
EQT0166	L04003 - Lime Kiln No. 2	33.6	57038	6		107.84	169
EQT0167	L04004 - Green Liquor Storage			.49			98
EQT0168	L04005 - Line 1/2 Causticizers			.5			22
EQT0169	L04006 - Line 1/2 White Liquor Filters			.67			75
EQT0170	L04007 - Line 1/2 Precoat Filters			2.5			50
EQT0171	L04008 - Line 1/2 Precoat Filter Vacuum Pumps			2			50
EQT0172	L04009 - Dregs Filter						20
EQT0173	L04010 - Dregs Filter Vacuum Pump			.33			10
EQT0174	L05001 - Paper Machine No. 1	13.39	6786	3.28		60.01	158
EQT0175	L05002 - Paper Machine No. 2	17.91	9081	3.28		60.01	127
EQT0176	L05002B - Paper Machine No. 2 - coating				3.7		53
EQT0177	L05003 - Paper Machine No. 5	31.79	16117	3.28		60.01	140

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Stack Information:

ID	Description	Velocity (ft/sec)	Flow Rate (cubic ft/min-actual)	Diameter (feet)	Discharge Area (square feet)	Height (feet)	Temperature (°F)
West Monroe Mill # 31							
EQT0178	L05004 - Paper Machine No. 6	30.97	15701	3.28		78.02	239
EQT0179	L05004B - Paper Machine No. 6 - coating					76	
EQT0180	L05005 - Paper Machine No. 7	34.71	17597	3.28	4.9	76.5	
EQT0181	L05005B - Paper Machine No. 7 - coating					78.02	255
EQT0182	L06001 - Dry End Starch Silos			2.67		128	
EQT0183	L06002 - Wet End Hopper			3		128	
EQT0184	L06003 - Wet End Starch Silo			1.33		129	
EQT0185	L06004 - Casein Silo			1.18		128	
EQT0186	L06005 - PVOH/Protein/Casein Hopper			3		131	
EQT0187	L06006 - Protein Silo			3		128	
EQT0191	L08001 - #7 Paper Machine Cooling Tower				226	20	
EQT0192	L08002 - #1 Cooling Tower				707	20.25	
EQT0193	L08003 - #2 Cooling Tower				555	40	
EQT0194	L08004 - #3 Cooling Tower				760	45	
EQT0198	L03030 - Barometric Condenser Supply Tank			40		41.3	90
EQT0199	L03031 - Evap Weak Black Liquor Recclaim Tank SE			28		28	85

Relationships:

ID	Description	Relationship	ID	Description
EQT0135	L03001 - No. 1 Foster Wheeler Boiler	Controls emissions from	PCS0001	HVLC Sources
EQT0137	L03003 - Bark Boiler	Controls emissions from	PCS0001	HVLC Sources
EQT0137	L03003 - Bark Boiler	Controls emissions from	PCS0002	LVHC Sources
EQT0166	L04003 - Lime Kiln No. 2	Controls emissions from	PCS0002	LVHC Sources

Subject Item Groups:

ID	Group Type	Group Description
CRG0001	Common Requirements Group	L09007 - Closed Vent System
GRP0005	Equipment Group	L03004/L03005 - No. 4 Recovery Combined Stack Cap
GRP0006	Equipment Group	L03007/L03008 - No. 5 Recovery Combined Stack Cap
GRP0007	Equipment Group	GRP 007 - No.1 and No.2 Lime Kiln Cap
PCS0001	Process Group	HVLC - HVLC Sources
PCS0002	Process Group	LVHC - LVHC Sources
PCS0003	Process Group	L09005 - Pulping Condensates
SCN0001	Alternate Operating Scenario	L03001SS - No. 1 Foster Wheeler Startup-Shutdown
SCN0002	Alternate Operating Scenario	L03002SS - No. 2 Foster Wheeler Startup-Shutdown

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
 Activity Number: PER20050001
 Permit Number: 2160-00001-V3
 Air - Title V Regular Permit Renewal

Subject Item Groups:

ID	Group Type	Group Description
SCN0003	Alternate Operating Scenario	L04002SS - No 1 Lime Kiln Startup-Shutdown
SCN0004	Alternate Operating Scenario	L04003SS - No. 2 Lime Kiln Startup-Shutdown
SCN0005	Alternate Operating Scenario	L03003SS - Bark Boiler Startup-Shutdown
SCN0006	Alternate Operating Scenario	L03004/L03005 SS - No. 4 Recovery Combined Stack Startup-Shutdown
SCN0007	Alternate Operating Scenario	L03006SS - No. 4 Recovery Boiler Smelt Dissolving Tank Startup-Shutdown
SCN0008	Alternate Operating Scenario	L03007/L03008 SS - No. 5 Recovery Combined Stack Startup-Shutdown
SCN0009	Alternate Operating Scenario	L03009 SS - No. 5 Recovery Boiler Smelt Dissolving Tank Startup-Shutdown
UNF0001	Unit or Facility Wide	WM 31 - West Monroe Mill # 31

Group Membership:

ID	Description	Member of Groups
CRG0001	L09007 - Closed Vent System	PCS0000000003
EQT0102	L02001 - A Digester Brownstock Washer System	CRG0000000001, PCS0000000001, PCS0000000003
EQT0103	L02002 - B Digester Brownstock Washer System	CRG0000000001, PCS0000000001, PCS0000000003
EQT0104	L02003 - D Digester Diffusion Washer System	CRG0000000001, PCS0000000001, PCS0000000003
EQT0117	L02016 - A Rejects Tank	CRG0000000001, PCS0000000001, PCS0000000003
EQT0118	L02017 - A/B Rejects Feed Tank	CRG0000000001, PCS0000000001, PCS0000000003
EQT0119	L02018 - B Rejects Tank	CRG0000000001, PCS0000000001, PCS0000000003
EQT0123	L02022 - D Surge Tank	CRG0000000001, PCS0000000001, PCS0000000003
EQT0124	L02023 - D Unscreened Stock Tank, Refined Chest, Primary Rejects Chest	CRG0000000001, PCS0000000001, PCS0000000003
EQT0126	L02025 - A Blow Tank	CRG0000000001, PCS0000000002, PCS0000000003
EQT0127	L02026 - B Blow Tank	CRG0000000001, PCS0000000002, PCS0000000003
EQT0129	L02028 - A Digester System	CRG0000000001, PCS0000000002, PCS0000000003
EQT0130	L02029 - B Digester System	CRG0000000001, PCS0000000002, PCS0000000003
EQT0131	L02030 - D Digester System	CRG0000000001, PCS0000000002, PCS0000000003
EQT0132	L02031 - Semi-Chem Digester System	CRG0000000001, PCS0000000002, PCS0000000003
EQT0133	L02032 - Evaporator Off Gases	CRG0000000001, PCS0000000002, PCS0000000003
EQT0134	L02033 - D Digester Chip Bin	CRG0000000001, PCS0000000002, PCS0000000003
EQT0135	L03001 - No. 1 Foster Wheeler Boiler	SCN0000000001
EQT0136	L03002 - No. 2 Foster Wheeler Boiler	SCN0000000002
EQT0137	L03003 - Bark Boiler	SCN0000000005
EQT0138	L03004 - No. 4 Recovery Boiler Stack A	GRP0000000005, SCN0000000006
EQT0139	L03005 - No. 4 Recovery Boiler Stack B	GRP0000000005, SCN0000000006
EQT0140	L03006 - No. 4 Recovery Boiler Smelt Dissolving Tank	SCN0000000007
EQT0141	L03007 - No. 5 Recovery Boiler Stack A	GRP0000000006
EQT0142	L03008 - No. 5 Recovery Boiler Stack B	GRP0000000006
EQT0143	L03009 - No. 5 Recovery Boiler Smelt Dissolving Tank	SCN0000000009
EQT0165	L04002 - Lime Kiln No. 1	GRP0000000007, SCN0000000003
EQT0166	L04003 - Lime Kiln No. 2	GRP0000000007, SCN0000000004
EQT0197	L02034 - "B" Refiner Rejects Tank	CRG0000000001, PCS0000000001, PCS0000000003
GRP0006	L03007/L03008 - No. 5 Recovery Combined Stack Cap	SCN0000000008

INVENTORIES

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Group Membership:

ID	Description	Member of Groups

NOTE: The UNF group relationship is not printed in this table. Every subject item is a member of the UNF group

Annual Maintenance Fee:

Fee Number	Air Contaminant Source	Multiplier	Units Of Measure
0350	Paperboard Mill (Rated Capacity)	3832.8	Ton/Day

SIC Codes:

2611	Pulp mills	UNF001
2631	Paperboard mills	AI1432
2631	Paperboard mills	UNF001

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
L09005 - Pulping Condensates															
CRG 0001 L09007													452.33	453.91	79.25
West Monroe Mill # 31															
ARE 0003 L01004					0.26	0.30	1.14						39.87	456.95	174.62
ARE 0004 L01005					4.13	6.51	18.07								
ARE 0006 L09007	7.78	9.34	34.09	49.29	59.15	215.90	15.30	18.36	67.03	23.75	28.51	104.05	460.81	462.46	80.73
EQT 0099 L01001							2.51	2.51	11.01						
EQT 0100 L01002							2.25	2.25	9.85						
EQT 0101 L01003							0.66	0.66	2.90						
EQT 0105 L02004													16.25	16.95	71.17
EQT 0107 L02006													0.86		3.77
EQT 0108 L02007															
EQT 0109 L02008													0.86		3.77
EQT 0110 L02009													0.86		3.77
EQT 0111 L02010													0.86		3.77
EQT 0112 L02011													0.86		3.77
EQT 0113 L02012													0.86		3.77
EQT 0114 L02013													0.86		3.77
EQT 0115 L02014													0.91		4.00
EQT 0116 L02015													6.88		30.14
EQT 0120 L02019															
EQT 0121 L02020													0.91	0.91	4.00
EQT 0122 L02021													0.91	0.91	4.00
EQT 0125 L02024													0.51		2.24

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC		
	Avg lb/hr	Max lb/hr	Tons/Year												
West Monroe Mill # 31															
EQT 0135 L03001	38.73	38.73	169.63	136.13	163.35	596.24	3.53	3.53	15.44	9.36	33.76	41.00	3.05	4.43	13.37
EQT 0136 L03002	38.73	38.73	169.63	98.68	118.41	432.20	3.53	3.53	15.44	9.36	33.76	41.00	3.05	4.43	13.37
EQT 0137 L03003	516.00	516.00	2266.08	258.00	258.00	1130.04	81.92	358.81	169.55	170.08	742.65	42.76	42.79	187.67	
EQT 0138 L03004		52.80				108.61			31.80		116.02			11.39	
EQT 0139 L03005		52.80				108.61			31.80		116.02			11.39	
EQT 0140 L03006	0.18	0.19	0.78				10.32	10.80	45.18	0.25	0.26	1.09	11.08	11.83	48.53
EQT 0141 L03007		163.94				85.37			35.99		191.99			23.96	
EQT 0142 L03008		163.94				85.37			35.99		191.99			23.96	
EQT 0143 L03009	0.16	0.17	0.72				9.49	9.90	41.58	0.23	0.24	1.00	10.20	10.63	44.67
EQT 0144 L03010													58.3	121.6	255.36
EQT 0145 L03011													0.91		4.00
EQT 0146 L03012													0.91		4.00
EQT 0147 L03013													0.91		4.00
EQT 0148 L03014													0.91		4.00
EQT 0149 L03015													0.91		4.00
EQT 0150 L03016													0.91		4.00
EQT 0151 L03017													0.91		4.00
EQT 0153 L03019													0.35		1.52
EQT 0154 L03020													0.35		1.52
EQT 0155 L03021													0.35		1.52
EQT 0156 L03022													0.35		1.52
EQT 0157 L03023													0.35		1.52
EQT 0160 L03026													0.02		0.09

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Subject Item	CO			NOx			PM10			SO2			VOC			
	Avg lb/hr	Max lb/hr	Tons/Year													
West Monroe Mill # 31																
EQT 0161 L03027													0.02		0.09	
EQT 0162 L03028													0.01		0.06	
EQT 0163 L03029													<0.001		<0.01	
EQT 0164 L04001							1.64	1.64	7.16				1.13	1.13	4.95	
EQT 0165 L04002	9.34					53.75		24.46			28.51			10.65		
EQT 0166 L04003	9.34					59.15		18.36			28.51		104.05		10.65	
EQT 0167 L04004													0.08		0.36	
EQT 0168 L04005													1.13	1.13	4.95	
EQT 0169 L04006													0.66	0.66	2.87	
EQT 0170 L04007													0.54	0.54	2.37	
EQT 0171 L04008													0.80	0.80	3.51	
EQT 0172 L04009													0.54	0.54	2.37	
EQT 0173 L04010													0.80	0.80	3.51	
EQT 0174 L05001													10.25	10.25	44.90	
EQT 0175 L05002													47.56	47.56	208.32	
EQT 0176 L05002B	0.96	0.96	4.22	1.15	1.15	5.02	0.09	0.09	0.38	0.01	0.01	0.03	0.06	0.06	0.28	
EQT 0177 L05003													17.70	17.70	77.54	
EQT 0178 L05004													158.54	158.54	694.4	
EQT 0179 L05004B	3.05	3.05	13.36	3.63	3.63	15.90	0.28	0.28	1.21	0.02	0.02	0.10	0.20	0.20	0.87	
EQT 0180 L05005													132.12	132.12	578.66	
EQT 0181 L05005B	3.59	3.59	15.74	4.28	4.28	18.74	0.33	0.33	1.42	0.03	0.03	0.11	0.24	0.24	1.03	
EQT 0182 L06001																
EQT 0183 L06002																

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Subject Item	CO		NOx		PM10		SO2		VOC			
	Avg lb/hr	Max lb/hr	Tons/Year									
West Monroe Mill # 31												
EQT 0184 L06003							0.09	0.09	0.38			
EQT 0185 L06004							0.09	0.09	0.38			
EQT 0186 L06005							0.09	0.09	0.38			
EQT 0187 L06006							0.09	0.09	0.38			
EQT 0188 L06007							<0.001	<0.001	<0.01			
EQT 0189 L06008										37.80	37.80	165.57
EQT 0190 L07001										118.92	142.70	522.29
EQT 0191 L08001							0.35	1.54				
EQT 0192 L08002							2.43		10.65			
EQT 0193 L08003							2.07		9.06			
EQT 0194 L08004							1.29		5.65			
EQT 0195 L08003										0.13		0.56
EQT 0196 L08004										<0.001		<0.01
EQT 0198 L03030										0.91		4.00
EQT 0199 L03031										0.91		4.00
EQT 0201 L08008	6.97	6.97	3.09	32.33	32.33	14.36	2.29	1.02	2.14	0.95	2.62	1.16
EQT 0203 L08010										0.01		0.03
EQT 0204 L08011										0.004	0.007	0.02
FUG 0005 L08001										0.08		0.36
FUG 0006 L08002										1.93		8.45
GRP 0005 L03004/L03005	50.43		220.87	103.74		454.36	30.37		133.03	110.81	485.36	10.87
GRP 0006 L03007/L03008	157.21		688.56	81.86		358.55	34.51		151.14	184.10	806.37	22.97
GRP 0007 GRP 0007	15.56		68.17	94.08		412.09	35.68		156.30	30.85	135.14	10.43
												45.70

EMISSION RATES FOR CRITERIA POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote.

Emission rates Notes:

CRG 0001	VOC	Avg lb/hr	This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually.
CRG 0001	VOC	Max lb/hr	This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually.
CRG 0001	VOC	Tons/Year	This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually.

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
ARE 0006 L09007	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	0.01		< 0.01
	1,2-Dichloroethane	0.002		< 0.001
	1,2-dichloroethylene	0.01	0.01	< 0.01
	1,4-Dichlorobenzene			< 0.001
	Acetaldehyde	1.11		0.20
	Acetophenone	0.06		< 0.01
	Acrolein	0.001	0.001	< 0.001
	Antimony (and compounds)	< 0.001	< 0.001	< 0.001
	Arsenic (and compounds)	< 0.001		< 0.001
	Barium (and compounds)	0.001	0.001	0.005
	Benzene	< 0.001		< 0.01
	Beryllium (Table 51.1)	< 0.001		< 0.001
	Cadmium (and compounds)	< 0.001		0.001
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	2.09		0.37
	Chlorobenzene	< 0.001	< 0.001	
	Chloroform	2.84		0.5
	Chromium VI (and compounds)	< 0.001		0.003
	Cobalt compounds	< 0.001		< 0.01
	Copper (and compounds)	0.001	0.001	0.006
	Cresol	0.86	0.86	0.15
	Cumene	0.11	0.11	0.02
	Dichloromethane	< 0.001		< 0.01
	Ethyl benzene	0.08	0.08	0.02
	Formaldehyde	0.13		0.02
	Hydrogen sulfide	1.03	1.03	0.18
	Lead compounds	0.01		0.03
	Manganese (and compounds)	0.01	0.01	0.03
	Mercury (and compounds)	< 0.001	< 0.001	< 0.001
	Methanol	155.86	156.55	27.31
	Methyl bromide	0.003		0.01
	Methyl chloride	0.03		0.12

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
ARE 0006 L09007	Methyl ethyl ketone	2.57	2.59	0.45
	Methyl isobutyl ketone	0.004	0.004	< 0.01
	Naphthalene (and Methyl naphthalenes)	0.21	0.21	0.90
	Nickel (and compounds)	0.003		0.011
	Phenol	0.7	0.7	0.12
	Polynuclear Aromatic Hydrocarbons	0.08		0.332
	Propionaldehyde	0.05	0.05	< 0.01
	Selenium (and compounds)	< 0.001	< 0.001	< 0.001
	Styrene	0.01	0.01	< 0.01
	Tetrachloroethylene	0.03		< 0.01
	Toluene	0.003	< 0.003	< 0.01
	Total reduced sulfur	250.93	251.76	43.96
	Trichloroethylene	0.01		< 0.01
	Vinyl chloride	0.04	0.04	< 0.01
CRG 0001 L09007	Xylene (mixed isomers)	0.003		< 0.01
	Zinc (and compounds)	0.01	0.01	0.04
	n-Hexane	0.001	0.001	< 0.01
	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	0.01		< 0.01
	1,2-Dichloroethane	0.002		< 0.001
	Acetaldehyde	1.11		0.20
	Acetophenone	0.06		< 0.01
	Acrolein	0.001	0.001	< 0.001
	Benzene	< 0.001		< 0.01
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	2.32		0.41
	Chlorobenzene	< 0.001	< 0.001	< 0.001
	Chloroform	2.86		0.50
	Cresol	0.85	0.86	0.15
	Cumene	0.06	0.06	< 0.01
	Dichloromethane	0.004	0.004	< 0.01
	Ethyl benzene	0.08	0.08	0.01
	Formaldehyde	0.13		0.02

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
CRG 0001 L09007	Hydrogen sulfide	0.21	0.21	0.04
	Methanol	141.23	141.93	24.74
	Methyl chloride	0.004		< 0.01
	Methyl ethyl ketone	2.52	2.54	0.44
	Methyl isobutyl ketone	0.004	0.004	< 0.01
	Phenol	0.84	0.84	0.15
	Propionaldehyde	0.05	0.05	< 0.01
	Styrene	0.01	0.01	< 0.01
	Tetrachloroethylene	0.03		< 0.01
	Toluene	0.003	0.003	< 0.01
	Total reduced sulfur	267.12	267.95	46.80
	Trichloroethylene	0.01		< 0.01
	Vinyl chloride	0.04		< 0.01
	Xylene (mixed isomers)	0.003	0.003	< 0.01
EQT 0105 L02004	n-Hexane	0.001	0.001	< 0.01
	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	0.001		< 0.01
	1,2-Dichloroethane	< 0.001		0.002
	Acetaldehyde	0.20		0.88
	Acetophenone	0.01		0.05
	Acrolein	< 0.001	< 0.001	0.001
	Benzene	< 0.001		< 0.01
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	0.001		< 0.01
	Chlorobenzene	< 0.001	< 0.001	< 0.001
	Chloroform	0.001		< 0.01
	Cresol	0.13	0.14	0.58
	Dichloromethane	< 0.001	< 0.001	< 0.01
	Ethyl benzene	0.02	0.02	0.07
	Formaldehyde	0.03	0.03	0.11
	Hydrogen sulfide	0.01	0.01	0.06
	Methanol	9.93	10.36	43.51
	Methyl chloride	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0105 L02004	Methyl ethyl ketone	0.04	0.04	0.19
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Phenol	0.01	0.01	0.05
	Propionaldehyde	0.01	0.01	0.04
	Styrene	0.002	0.003	0.01
	Tetrachloroethylene	0.01	0.01	0.03
	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	2.93	3.06	12.83
	Trichloroethylene	0.001		< 0.01
	Vinyl chloride	0.01		0.03
	Xylene (mixed isomers)	< 0.001	< 0.001	< 0.01
	n-Hexane	< 0.001	< 0.001	< 0.01
EQT 0107 L02006	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.35		1.53
EQT 0108 L02007	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0108 L02007	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.35		1.53
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
EQT 0109 L02008	n-Hexane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
EQT 0110 L02009	Total reduced sulfur	0.35		1.53
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0110 L02009	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.35		1.53
	Trichloroethylene	< 0.001		< 0.01
EQT 0111 L02010	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0112 L02011	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.35		1.53
EQT 0113 L02012	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.35		1.53
	Trichloroethylene	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0113 L02012	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0114 L02013	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Chloroform	0.01		0.05
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.12		0.53
	Methyl ethyl ketone	0.01		0.03
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.004		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
EQT 0115 L02014	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.35		1.53
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
EQT 0116 L02015	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0115 L02014	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0116 L02015	1,1,2-Trichloroethane	0.002		0.01
	1,2,4-Trichlorobenzene	0.05		0.23
	Acetaldehyde	0.04		0.18
	Acrolein	0.003		0.014
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	0.01		0.05
	Chlorobenzene	0.001		0.005
	Cresol	0.19		0.83
	Formaldehyde	0.003		0.01
	Methanol	1.89		8.30
	Methyl ethyl ketone	0.06		0.24
	Methyl isobutyl ketone	0.003		0.01
	Propionaldehyde	0.06		0.26
	Styrene	0.01		0.04
	Tetrachloroethylene	0.02		0.07
EQT 0120 L02019	Toluene	0.002		< 0.01
	Total reduced sulfur	1.26		5.53
	Trichloroethylene	0.03		0.14
	Xylene (mixed isomers)	0.005		0.02
	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001	< 0.001	< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71	0.71	3.11

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0120 L02019	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	0.05	0.05	0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001	0.001	< 0.01
	n-Hexane	< 0.001	< 0.001	< 0.01
EQT 0121 L02020	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003	0.003	0.01
	Acrolein	< 0.001	< 0.001	< 0.001
	Benzene	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71	0.71	3.11
	Methyl ethyl ketone	0.004	0.004	0.02
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Styrene	< 0.001	< 0.001	< 0.01
	Tetrachloroethylene	< 0.001	< 0.001	< 0.01
	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	0.05	0.05	0.23
	Trichloroethylene	< 0.001		< 0.01
EQT 0122 L02021	Xylene (mixed isomers)	0.001	0.001	< 0.01
	n-Hexane	< 0.001	< 0.001	< 0.01
	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003	0.003	0.01
	Acrolein	< 0.001	< 0.001	< 0.001
	Benzene	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71	0.71	3.11
	Methyl ethyl ketone	0.004	0.004	0.02
	Methyl isobutyl ketone	< 0.001	< 0.001	0.01
	Styrene	< 0.001	< 0.001	< 0.01
	Tetrachloroethylene	< 0.001	< 0.001	< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0122 L02021	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	0.05	0.05	0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001	0.001	< 0.01
	n-Hexane	< 0.001	< 0.001	< 0.01
EQT 0125 L02024	Acetaldehyde	< 0.001		< 0.01
	Benzene	< 0.001		< 0.01
	Methanol	0.48		2.10
	Methyl ethyl ketone	< 0.001		< 0.01
	Methyl isobutyl ketone	0.004		0.02
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.002		0.01
	Xylene (mixed isomers)	0.001		< 0.01
EQT 0135 L03001	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		0.001
	Acetaldehyde	0.01		0.03
	Acetophenone	< 0.001		< 0.01
	Acrolein	< 0.001	< 0.001	< 0.001
	Arsenic (and compounds)	< 0.001	< 0.001	< 0.001
	Barium (and compounds)	< 0.001	< 0.001	< 0.001
	Benzene	< 0.001	< 0.001	< 0.01
	Beryllium (Table 51.1)	< 0.001	< 0.001	< 0.001
	Cadmium (and compounds)	< 0.001	< 0.001	0.002
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Chlorobenzene	< 0.001	< 0.001	< 0.001
	Chloroform	< 0.001	< 0.001	< 0.01
	Chromium VI (and compounds)	< 0.001	< 0.001	0.003
	Cobalt compounds	< 0.001		< 0.01
	Copper (and compounds)	< 0.001	< 0.001	0.002
	Cresol	0.004	0.01	0.02

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0135 L03001	Dichloromethane	< 0.001	< 0.001	< 0.01
	Ethyl benzene	< 0.001	0.002	< 0.01
	Formaldehyde	0.04	0.04	0.15
	Hydrogen sulfide	0.001	0.004	< 0.01
	Manganese (and compounds)	< 0.001	< 0.001	< 0.01
	Mercury (and compounds)	< 0.001	< 0.001	0.001
	Methanol	0.31	1.14	1.35
	Methyl chloride	< 0.001		< 0.01
	Methyl ethyl ketone	0.001	0.01	< 0.01
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Naphthalene	< 0.001	< 0.001	< 0.01
	Nickel (and compounds)	< 0.001	< 0.001	0.004
	Phenol	< 0.001	0.001	< 0.01
	Polynuclear Aromatic Hydrocarbons	< 0.001		< 0.001
	Propionaldehyde	< 0.001	< 0.001	< 0.01
	Selenium (and compounds)	< 0.001	< 0.001	< 0.001
	Styrene	< 0.001	< 0.001	< 0.01
	Tetrachloroethylene	< 0.001	< 0.001	< 0.01
	Toluene	0.002	0.002	< 0.01
EQT 0136 L03002	Total reduced sulfur	0.10	0.36	0.43
	Trichloroethylene	< 0.001		< 0.01
	Vinyl chloride	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001	< 0.001	< 0.01
	Zinc (and compounds)	0.01	0.01	0.06
	n-Hexane	0.83	0.83	3.63
	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0136 L03002	Benzene	< 0.001	< 0.001	0.01
	Beryllium (Table 51.1)	< 0.001	< 0.001	< 0.001
	Cadmium (and compounds)	< 0.001	< 0.001	0.002
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Chlorobenzene	< 0.001	< 0.001	< 0.01
	Chloroform	< 0.001	< 0.001	< 0.01
	Chromium VI (and compounds)	< 0.001	< 0.001	0.003
	Cobalt compounds	< 0.001		< 0.01
	Copper (and compounds)	< 0.001	< 0.001	< 0.01
	Cresol	0.004	0.01	0.02
	Dichloromethane	< 0.001	< 0.001	< 0.01
	Ethyl benzene	< 0.001	0.002	< 0.01
	Formaldehyde	0.04	0.04	0.15
	Hydrogen sulfide	0.001	0.004	< 0.01
	Manganese (and compounds)	< 0.001	< 0.001	< 0.01
	Mercury (and compounds)	< 0.001	< 0.001	0.001
	Methanol	0.31	1.14	1.35
	Methyl chloride	< 0.001		< 0.01
	Methyl ethyl ketone	0.001	0.01	< 0.01
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Naphthalene	< 0.001	< 0.001	< 0.01
	Nickel (and compounds)	< 0.001	< 0.001	0.004
	Phenol	< 0.001	0.001	< 0.01
	Polynuclear Aromatic Hydrocarbons	< 0.001		< 0.001
	Propionaldehyde	< 0.001	< 0.001	< 0.01
	Selenium (and compounds)	< 0.001	< 0.001	< 0.001
	Styrene	< 0.001	< 0.001	< 0.01
	Tetrachloroethylene	< 0.001	< 0.001	< 0.01
	Toluene	0.002	0.002	< 0.01
	Total reduced sulfur	0.10	0.36	0.43
	Trichloroethylene	< 0.001		< 0.01
	Vinyl chloride	< 0.001	< 0.001	< 0.01
	Xylene (mixed isomers)	< 0.001	< 0.001	< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0136 L03002	Zinc (and compounds)	0.01	0.01	0.06
	n-Hexane	0.83	0.83	3.63
EQT 0137 L03003	1,1,1-Trichloroethane	0.001	0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.01
	Acetaldehyde	1.62	1.94	7.19
	Acetophenone	0.002		< 0.01
	Acrolein	0.010	0.010	0.045
	Arsenic (and compounds)	0.01		0.024
	Barium (and compounds)	0.28	0.28	1.205
	Benzene	0.050		0.23
	Beryllium (Table 51.1)	0.01		0.064
	Cadmium (and compounds)	0.001		0.006
	Carbon disulfide	0.11	0.11	0.49
	Carbon tetrachloride	0.04		0.18
	Chlorinated Dibenzo-P-Dioxins	< 0.001	< 0.001	0.0002
	Chlorinated dibenzofurans	< 0.001	< 0.001	< 0.001
	Chlorobenzene	< 0.001	< 0.001	< 0.001
	Chloroform	0.060	0.060	0.250
	Chromium VI (and compounds)	0.004		0.018
	Cobalt compounds	0.01		0.04
	Copper (and compounds)	0.03	0.03	0.128
	Cresol	0.02	0.02	0.08
	Cumene	0.01	0.01	0.04
	Dibutyl phthalate	0.03	0.03	0.12
	Dichloromethane	0.80	0.80	3.50
	Ethyl benzene	0.002	0.002	< 0.01
	Formaldehyde	0.30	0.30	1.29
	Hydrochloric acid	0.29	0.29	1.28
	Hydrogen sulfide	0.02	0.02	0.09
	Lead compounds	0.02		0.11
	Manganese (and compounds)	0.65	0.65	2.83
	Mercury (and compounds)	< 0.001	< 0.001	0.001

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0137 L03003	Methanol	4.32	4.34	18.93
	Methyl chloride	0.04		0.18
	Methyl ethyl ketone	0.05	0.05	0.23
	Methyl isobutyl ketone	0.18	0.18	0.79
	Naphthalene	0.10	0.10	0.45
	Nickel (and compounds)	0.01		0.06
	Phenol	0.02	0.02	0.07
	Phosphorus	0.14		0.60
	Polynuclear Aromatic Hydrocarbons	0.15		0.678
	Propionaldehyde	< 0.001	< 0.001	< 0.01
	Selenium (and compounds)	< 0.001	< 0.001	0.003
	Styrene	0.01	0.01	0.06
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	0.01	0.01	0.04
	Total reduced sulfur	5.02	5.04	21.98
	Trichloroethylene	0.003		0.01
	Vinyl chloride	< 0.001	< 0.001	< 0.01
	Xylene (mixed isomers)	0.002	0.002	0.01
EQT 0138 L03004	Zinc (and compounds)	0.27	0.27	1.17
	n-Hexane	0.47	0.47	2.07
	1,1,1-Trichloroethane		< 0.001	
	Acrolein		< 0.001	
	Aniline		< 0.001	
	Antimony (and compounds)		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		< 0.001	
	Carbon disulfide		0.003	
	Copper (and compounds)		< 0.001	
	Cumene		< 0.001	
	Dibutyl phthalate		< 0.001	
	Ethyl benzene		< 0.001	
	Hydrochloric acid		4.50	
	Hydrofluoric acid		0.04	
	Hydrogen sulfide		15.39	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0138 L03004	Manganese (and compounds)		0.02	
	Mercury (and compounds)		< 0.001	
	Methanol		1.07	
	Methyl ethyl ketone		0.06	
	Methyl isobutyl ketone		0.002	
	Naphthalene		0.10	
	Phenol		0.20	
	Propionaldehyde		< 0.001	
	Selenium (and compounds)		< 0.001	
	Styrene		0.03	
	Sulfuric acid		1.51	
	Toluene		0.01	
	Total reduced sulfur		15.39	
	Zinc (and compounds)		0.02	
EQT 0139 L03005	n-Hexane		0.01	
	1,1,1-Trichloroethane		< 0.001	
	Acrolein		< 0.001	
	Aniline		< 0.001	
	Antimony (and compounds)		< 0.001	
	Barium (and compounds)		< 0.001	
	Carbon disulfide		0.003	
	Copper (and compounds)		< 0.001	
	Cumene		< 0.001	
	Dibutyl phthalate		< 0.001	
	Ethyl benzene		< 0.001	
	Hydrochloric acid		4.50	
	Hydrofluoric acid		0.04	
	Hydrogen sulfide		15.39	
	Manganese (and compounds)		0.02	
	Mercury (and compounds)		< 0.001	
	Methanol		1.07	
	Methyl ethyl ketone		0.06	
	Methyl isobutyl ketone		0.002	
	Naphthalene		0.10	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0139 L03005	Phenol		0.20	
	Propionaldehyde		< 0.001	
	Selenium (and compounds)		< 0.001	
	Styrene		0.03	
	Sulfuric acid		1.51	
	Toluene		0.01	
	Total reduced sulfur		15.39	
	Zinc (and compounds)		0.02	
	n-Hexane		0.01	
EQT 0140 L03006	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	0.01		0.03
	2,2,4-Trimethylpentane	< 0.001		< 0.01
	Acetaldehyde	0.04		0.18
	Acrolein	< 0.001	< 0.001	0.002
	Ammonia	2.81	2.94	12.30
	Antimony (and compounds)	< 0.001	< 0.001	0.002
	Arsenic (and compounds)	< 0.001	< 0.001	< 0.001
	Barium (and compounds)	0.001	0.001	0.005
	Benzene	< 0.001	< 0.001	< 0.01
	Beryllium (Table 51.1)	< 0.001	< 0.001	< 0.001
	Cadmium (and compounds)	< 0.001		0.001
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Chlorobenzene	< 0.001	< 0.001	0.001
	Chloroform	< 0.001	< 0.001	< 0.01
	Chloroprene	0.001	0.001	< 0.01
	Chromium VI (and compounds)	< 0.001		0.001
	Copper (and compounds)	< 0.001	< 0.001	0.003
	Cumene	< 0.001	< 0.001	< 0.01
	Dibutyl phthalate	0.01	0.02	0.06
	Dichloromethane	< 0.001	< 0.001	< 0.01
	Ethyl benzene	< 0.001	< 0.001	< 0.01
	Formaldehyde	0.30	0.31	1.31
	Hexachlorocyclopentadiene	0.01		0.02

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0140 L03006	Hydrogen sulfide	0.05	0.05	0.23
	Lead compounds	< 0.001		< 0.01
	Manganese (and compounds)	0.002	0.002	< 0.01
	Mercury (and compounds)	< 0.001	< 0.001	< 0.001
	Methanol	0.58	0.61	2.53
	Methyl bromide	< 0.001		< 0.01
	Methyl chloride	0.01		0.03
	Methyl ethyl ketone	0.002	0.003	< 0.01
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Naphthalene	0.03	0.03	0.14
	Nickel (and compounds)	< 0.001		0.002
	Phosphorus	0.01		0.03
	Selenium (and compounds)	< 0.001	< 0.001	< 0.001
	Styrene	0.01	0.01	0.03
	Tetrachloroethylene	< 0.001	< 0.001	< 0.01
	Toluene	< 0.001	0.001	< 0.01
	Total reduced sulfur	1.83	1.92	8.03
	Trichloroethylene	< 0.001		< 0.01
	Vinyl acetate	0.003	0.003	0.01
	Xylene (mixed isomers)	< 0.001	< 0.001	< 0.01
EQT 0141 L03007	Zinc (and compounds)	0.01	0.01	0.03
	bis(2-ethylhexyl)phthalate	< 0.001		< 0.01
	n-Hexane	< 0.001	< 0.001	< 0.01
	Antimony (and compounds)		0.002	
	Barium (and compounds)		< 0.001	
	Copper (and compounds)		0.001	
	Hydrochloric acid		3.30	
	Hydrogen sulfide		3.37	
	Mercury (and compounds)		0.002	
	Methanol		1.04	
	Methyl ethyl ketone		0.07	
	Methyl isobutyl ketone		0.002	
	Naphthalene		0.03	
	Selenium (and compounds)		< 0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0141 L03007	Styrene		0.03	
	Sulfuric acid		2.31	
	Toluene		0.02	
	Total reduced sulfur		3.37	
	Xylene (mixed isomers)		0.03	
	Zinc (and compounds)		0.02	
	n-Hexane		0.02	
EQT 0142 L03008	Antimony (and compounds)		0.002	
	Barium (and compounds)		< 0.001	
	Copper (and compounds)		0.001	
	Hydrochloric acid		3.30	
	Hydrogen sulfide		3.37	
	Mercury (and compounds)		0.002	
	Methanol		1.04	
	Methyl ethyl ketone		0.07	
	Methyl isobutyl ketone		0.002	
	Naphthalene		0.03	
	Selenium (and compounds)		< 0.001	
	Styrene		0.03	
	Sulfuric acid		2.31	
	Toluene		0.02	
	Total reduced sulfur		3.37	
EQT 0143 L03009	Xylene (mixed isomers)		0.03	
	Zinc (and compounds)		0.02	
	n-Hexane		0.02	
	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,2,4-Trichlorobenzene	0.01		0.02
	2,2,4-Trimethylpentane	< 0.001		< 0.01
	Acetaldehyde	0.04	0.04	0.16
	Acrolein	< 0.001	< 0.001	0.002
	Ammonia	2.58	2.70	11.32
EQT 0143 L03009	Antimony (and compounds)	< 0.001	< 0.001	0.002
	Arsenic (and compounds)	< 0.001	< 0.001	0.001

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0143 L03009	Barium (and compounds)	0.001	0.001	0.005
	Benzene	< 0.001	< 0.001	< 0.01
	Beryllium (Table 51.1)	< 0.001	< 0.001	< 0.001
	Cadmium (and compounds)	< 0.001	< 0.001	0.001
	Carbon disulfide	< 0.001	< 0.001	< 0.01
	Chlorobenzene	< 0.001	< 0.001	0.001
	Chloroform	< 0.001	< 0.001	< 0.01
	Chloroprene	< 0.001	< 0.001	< 0.01
	Chromium VI (and compounds)	< 0.001	< 0.001	0.001
	Copper (and compounds)	< 0.001	< 0.001	0.003
	Cumene	< 0.001	< 0.001	< 0.01
	Dibutyl phthalate	0.01	0.01	0.06
	Dichloromethane	< 0.001	< 0.001	< 0.01
	Ethyl benzene	< 0.001	< 0.001	< 0.01
	Formaldehyde	0.27	0.29	1.20
	Hexachlorocyclopentadiene	0.004		0.02
	Hydrogen sulfide	0.05	0.05	0.21
	Lead compounds	< 0.001		< 0.01
	Manganese (and compounds)	0.002	0.002	< 0.01
	Mercury (and compounds)	< 0.001	< 0.001	< 0.001
	Methanol	0.53	0.55	2.32
	Methyl bromide	< 0.001		< 0.01
	Methyl chloride	0.01		0.03
	Methyl ethyl ketone	0.002	0.002	< 0.01
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Naphthalene	0.03	0.03	0.12
	Nickel (and compounds)	< 0.001		0.001
	Phosphorus	0.01		0.03
	Propionaldehyde	0.002	0.002	0.01
	Selenium (and compounds)	< 0.001	< 0.001	0.001
	Styrene	0.01	0.01	0.03
	Tetrachloroethylene	< 0.001	< 0.001	< 0.01
	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	1.74	1.82	7.62

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0143 L03009	Trichloroethylene	< 0.001		< 0.01
	Vinyl acetate	0.002	0.002	0.01
	Xylene (mixed isomers)	< 0.001	< 0.001	< 0.01
	Zinc (and compounds)	0.01	0.01	0.03
	bis(2-ethylhexyl)phthalate	< 0.001		< 0.01
	n-Hexane	< 0.001	< 0.001	< 0.01
EQT 0144 L03010	1,1,1-Trichloroethane	< 0.001	< 0.001	< 0.01
	1,1,2-Trichloroethane	0.01	0.01	0.02
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.01	0.01	0.05
	Benzene	< 0.001	< 0.001	< 0.01
	Carbon disulfide	0.01	0.02	0.05
	Chlorobenzene	< 0.001	< 0.001	0.002
	Chloroform	0.08	0.16	0.34
	Cumene	0.37	0.78	1.64
	Dichloromethane	0.004	0.01	0.02
	Formaldehyde	0.01	0.01	0.05
	Hydrogen sulfide	1.35	2.82	5.92
	Methanol	0.75	0.90	3.29
	Methyl bromide	0.004		< 0.02
	Methyl chloride	0.09		0.39
	Methyl ethyl ketone	0.01	0.01	0.03
	Methyl isobutyl ketone	< 0.001	0.002	< 0.01
	Styrene	0.004	0.01	0.02
	Tetrachloroethylene	0.004	0.01	0.02
	Toluene	0.01	0.01	0.03
EQT 0145 L03011	Total reduced sulfur	2.01	4.20	8.81
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.005	0.011	0.02
	n-Hexane	0.15	0.31	0.64
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0145 L03011	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
EQT 0146 L03012	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
EQT 0147 L03013	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0147 L03013	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
EQT 0148 L03014	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
EQT 0149 L03015	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0149 L03015	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0150 L03016	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
	Trichloroethylene	< 0.001		< 0.01
EQT 0151 L03017	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0151 L03017	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
EQT 0153 L03019	n-Hexane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.13		0.57
	Methyl ethyl ketone	0.01		0.05
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.01		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
EQT 0154 L03020	Total reduced sulfur	0.18		0.79
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0154 L03020	Hydrogen sulfide	0.05		0.21
	Methanol	0.13		0.57
	Methyl ethyl ketone	0.01		0.05
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.01		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.18		0.79
	Xylene (mixed isomers)	< 0.001		< 0.01
EQT 0155 L03021	n-Hexane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.13		0.57
	Methyl ethyl ketone	0.01		0.05
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.01		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
EQT 0156 L03022	Total reduced sulfur	0.18		0.79
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.13		0.57

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0156 L03022	Methyl ethyl ketone	0.01		0.05
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.01		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.18		0.79
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0157 L03023	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.02		0.09
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Formaldehyde	< 0.001		< 0.01
	Hydrogen sulfide	0.05		0.21
	Methanol	0.13		0.57
	Methyl ethyl ketone	0.01		0.05
	Methyl isobutyl ketone	< 0.001		< 0.01
	Phenol	0.01		0.02
	Propionaldehyde	0.002		0.01
	Styrene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.18		0.79
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0160 L03026	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	< 0.001		< 0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Chloroform	< 0.001		< 0.01
	Methanol	0.001		< 0.01
	Methyl ethyl ketone	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0160 L03026	Methyl isobutyl ketone	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0161 L03027	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	< 0.001		< 0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.01
	Chloroform	< 0.001		< 0.01
	Methanol	0.001		< 0.01
	Methyl ethyl ketone	< 0.001		< 0.01
	Methyl isobutyl ketone	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0162 L03028	1,1,2-Trichloroethane	< 0.001		< 0.01
	Acetaldehyde	< 0.001		< 0.01
	Benzene	< 0.001		< 0.01
	Chlorobenzene	< 0.001		< 0.001
	Methanol	< 0.001		< 0.01
	Methyl ethyl ketone	< 0.001		< 0.01
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	< 0.001		< 0.01
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0163 L03029	Acetaldehyde	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0163 L03029	Chlorobenzene	< 0.001		< 0.001
	Methanol	< 0.001		< 0.01
	Methyl ethyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
EQT 0164 L04001	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.11	0.11	0.47
	Acrolein	< 0.001	< 0.001	0.003
	Ammonia	7.25	7.25	31.77
	Benzene	< 0.001	< 0.001	< 0.01
	Methanol	0.85	0.85	3.73
	Methyl ethyl ketone	0.02	0.02	0.08
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Styrene	0.01	0.01	0.03
	Tetrachloroethylene	0.002	0.002	< 0.01
	Toluene	0.003	0.003	0.01
	Xylene (mixed isomers)	0.001	0.001	0.01
EQT 0165 L04002	Acrolein		< 0.001	
	Antimony (and compounds)		< 0.001	
	Barium (and compounds)		0.001	
	Carbon disulfide		0.01	
	Chlorobenzene		< 0.001	
	Copper (and compounds)		0.001	
	Hydrogen sulfide		2.39	
	Manganese (and compounds)		0.01	
	Mercury (and compounds)		< 0.001	
	Methanol		2.11	
	Methyl ethyl ketone		0.050	
	Methyl isobutyl ketone		< 0.001	
	Phenol		0.02	
	Selenium (and compounds)		< 0.001	
	Styrene		< 0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0165 L04002	Toluene		< 0.001	
	Total reduced sulfur		8.83	
	Xylene (mixed isomers)		0.003	
	Zinc (and compounds)		0.01	
	n-Hexane		< 0.001	
EQT 0166 L04003	Acrolein		< 0.001	
	Antimony (and compounds)		< 0.001	
	Barium (and compounds)		0.001	
	Carbon disulfide		0.01	
	Chlorobenzene		< 0.001	
	Copper (and compounds)		0.001	
	Cresol		0.003	
	Cumene		0.002	
	Hydrogen sulfide		1.77	
	Manganese (and compounds)		0.01	
	Mercury (and compounds)		< 0.001	
	Methanol		2.11	
	Methyl ethyl ketone		0.05	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene (and Methyl napthalenes)		0.21	
	Phenol		0.02	
	Selenium (and compounds)		< 0.001	
	Styrene		< 0.001	
	Toluene		< 0.001	
EQT 0167 L04004	Total reduced sulfur		7.74	
	Xylene (mixed isomers)		0.003	
	Zinc (and compounds)		0.01	
	n-Hexane		< 0.001	
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,1,2-Trichloroethane	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0167 L04004	Chlorobenzene	< 0.001		0.001
	Chloroform	< 0.001		< 0.01
	Methanol	0.03		0.15
	Methyl ethyl ketone	< 0.001		< 0.01
	Methyl isobutyl ketone	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.003		0.01
	Xylene (mixed isomers)	< 0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
EQT 0168 L04005	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	Acetaldehyde	0.11	0.11	0.47
	Acrolein	< 0.001	< 0.001	0.003
	Ammonia	7.25	7.25	31.77
	Benzene	< 0.001	< 0.001	< 0.01
	Methanol	0.85	0.85	3.73
	Methyl ethyl ketone	0.02	0.02	0.08
	Methyl isobutyl ketone	< 0.001	< 0.001	< 0.01
	Styrene	0.01	0.01	0.03
	Tetrachloroethylene	0.002	0.002	< 0.01
	Toluene	0.003	0.003	0.01
	Xylene (mixed isomers)	0.001	0.001	0.01
EQT 0169 L04006	Benzene	< 0.001		< 0.01
	Formaldehyde	0.07		0.30
	Methanol	0.47	0.47	2.07
	Methyl ethyl ketone	0.01	0.01	0.02
	Styrene	0.002	0.002	< 0.01
	Xylene (mixed isomers)	0.002	0.002	0.01
EQT 0170 L04007	1,1,1-Trichloroethane	0.003	0.003	0.01
	Acetaldehyde	0.03		0.15
	Acrolein	0.002	0.002	0.007
	Benzene	< 0.001		< 0.01
	Chlorobenzene	0.002	0.002	0.009
	Formaldehyde	0.01		0.03

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0170 L04007	Methanol	0.38	0.38	1.66
	Methyl ethyl ketone	0.01	0.01	0.02
	Methyl isobutyl ketone	0.003	0.003	0.01
	Styrene	0.001	0.001	< 0.01
	Tetrachloroethylene	0.002		< 0.01
	Toluene	0.01	0.01	0.03
	Total reduced sulfur	0.02	0.02	0.07
	Xylene (mixed isomers)	0.004	0.004	0.02
EQT 0171 L04008	1,2,4-Trichlorobenzene	0.01		0.05
	Acetaldehyde	0.01	0.01	0.03
	Chloroform	0.002	0.002	< 0.01
	Methanol	0.57	0.57	2.49
	Methyl ethyl ketone	0.02	0.02	0.07
	Methyl isobutyl ketone	0.002	0.002	0.01
	Styrene	< 0.001	< 0.001	< 0.01
	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	0.04	0.04	0.15
	Xylene (mixed isomers)	0.001	0.001	0.01
EQT 0172 L04009	1,1,1-Trichloroethane	0.003	0.003	0.01
	Acetaldehyde	0.03		0.15
	Acrolein	0.002	0.002	0.007
	Benzene	< 0.001		< 0.01
	Chlorobenzene	0.002	0.002	0.009
	Formaldehyde	0.01		0.03
	Methanol	0.38	0.38	1.66
	Methyl ethyl ketone	0.01	0.01	0.02
	Methyl isobutyl ketone	0.003	0.003	0.01
	Styrene	0.001	0.001	< 0.01
	Tetrachloroethylene	0.002		< 0.01
	Toluene	0.01	0.01	0.03
	Total reduced sulfur	0.02	0.02	0.07
	Xylene (mixed isomers)	0.004	0.004	0.02
EQT 0173 L04010	1,2,4-Trichlorobenzene	0.01		0.05
	Acetaldehyde	0.01	0.01	0.03

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0173 L04010	Chloroform	0.002	0.002	< 0.01
	Methanol	0.57	0.57	2.49
	Methyl ethyl ketone	0.02	0.02	0.07
	Methyl isobutyl ketone	0.002	0.002	0.01
	Styrene	< 0.001	< 0.001	< 0.01
	Toluene	< 0.001	< 0.001	< 0.01
	Total reduced sulfur	0.04	0.04	0.15
	Xylene (mixed isomers)	0.001	0.001	0.01
EQT 0174 L05001	Acetaldehyde	1.93		8.43
	Methanol	7.25	7.25	31.76
	Methyl ethyl ketone	0.18	0.18	0.77
EQT 0175 L05002	Acetaldehyde	3.24		14.19
	Acrolein	0.12	0.12	0.544
	Benzene	0.02		0.10
	Methanol	16.56	16.56	72.53
	Methyl ethyl ketone	0.18	0.18	0.77
	Methyl isobutyl ketone	0.07	0.07	0.31
	Styrene	0.04	0.04	0.17
	Toluene	0.04	0.04	0.17
	Trichloroethylene	0.11		0.47
	Xylene (mixed isomers)	0.09	0.09	0.40
EQT 0177 L05003	Acetaldehyde	1.21	1.21	5.28
	Acrolein	0.05	0.05	0.202
	Benzene	0.01	0.01	0.04
	Methanol	6.16	6.16	27.00
	Methyl ethyl ketone	0.07	0.07	0.29
	Methyl isobutyl ketone	0.03	0.03	0.11
	Styrene	0.01	0.01	0.06
	Toluene	0.01	0.01	0.06
	Trichloroethylene	0.04		0.18
	Xylene (mixed isomers)	0.03	0.03	0.15
EQT 0178 L05004	Acetaldehyde	10.80	10.80	47.30
	Acrolein	0.41	0.41	1.813
	Benzene	0.08	0.08	0.34

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0178 L05004	Methanol	55.20	55.20	241.78
	Methyl ethyl ketone	0.59	0.59	2.58
	Methyl isobutyl ketone	0.23	0.23	1.02
	Styrene	0.13	0.13	0.58
	Toluene	0.13	0.13	0.55
	Trichloroethylene	0.36	-	1.58
	Xylene (mixed isomers)	0.31	0.31	1.34
EQT 0180 L05005	Acetaldehyde	9.00	9.00	39.42
	Acrolein	0.35	0.35	1.511
	Benzene	0.07	0.07	0.28
	Methanol	46.00	46.00	201.48
	Methyl ethyl ketone	0.49	0.49	2.15
	Methyl isobutyl ketone	0.20	0.20	0.85
	Styrene	0.11	0.11	0.48
	Toluene	0.11	0.11	0.46
	Trichloroethylene	0.30	-	1.31
	Xylene (mixed isomers)	0.26	0.26	1.12
EQT 0189 L06008	Acetaldehyde	2.36	-	10.34
	Acrylonitrile	0.03	0.03	0.149
	Ammonia	50.00	50.00	219.00
	Ethyl Acrylate	0.25	0.25	1.10
	Formaldehyde	0.06	-	0.25
	Methanol	15.80	15.80	69.20
	Styrene	6.19	6.19	27.11
	Vinyl acetate	13.11	13.11	57.42
EQT 0190 L07001	Acetaldehyde	1.02	-	4.48
	Ammonia	0.005	0.005	0.02
	Chlorine	< 0.001	< 0.001	< 0.01
	Formaldehyde	0.001	-	0.01
	Hydrogen sulfide	4.01	4.03	17.55
	Methanol	115.86	139.03	508.85
	Methyl ethyl ketone	1.02	1.22	4.48
	Propionaldehyde	1.02	1.22	4.48
	Total reduced sulfur	4.01	4.03	17.55

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0198 L03030	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.001
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
EQT 0199 L03031	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	< 0.001		< 0.01
	1,2-Dichloroethane	< 0.001		< 0.001
	Acetaldehyde	0.003		0.01
	Acrolein	< 0.001		< 0.001
	Benzene	< 0.001		< 0.001
	Carbon tetrachloride	< 0.001		< 0.01
	Methanol	0.71		3.11
	Methyl ethyl ketone	0.004		0.02
	Methyl isobutyl ketone	< 0.001		< 0.01
	Styrene	< 0.001		< 0.01
	Tetrachloroethylene	< 0.001		< 0.01
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	0.05		0.23
	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.001		< 0.01
	n-Hexane	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
EQT 0204 L09011	Acrylamide	0.004		0.019
FUG 0005 L09001	Acetaldehyde	0.01		0.06
	Carbon disulfide	0.02		0.08
	Chloroform	< 0.001		< 0.01
	Formaldehyde	0.002		< 0.01
	Methanol	0.03		0.12
	Phenol	0.003		0.01
	Toluene	0.02		0.08
FUG 0006 L09002	Acetaldehyde	0.19		0.82
	Carbon disulfide	0.11		0.46
	Chloroform	0.05		0.23
	Cumene	0.02		0.11
	Formaldehyde	0.05		0.22
	Methanol	1.11		4.87
	Methyl ethyl ketone	< 0.001		< 0.01
	Naphthalene (and Methyl naphthalenes)	0.13		0.58
	Phenol	0.100		0.440
	Toluene	0.17		0.72
GRP 0005 L03004/L03005	1,1,1-Trichloroethane	< 0.001		< 0.01
	1,2,4-Trichlorobenzene	0.03		0.14
	2,2,4-Trimethylpentane	0.01		0.04
	Acetaldehyde	1.02		4.48
	Acetophenone	< 0.001		< 0.01
	Acrolein	< 0.001		0.003
	Acrylonitrile	< 0.001		0.001
	Aniline	< 0.001		< 0.01
	Antimony (and compounds)	< 0.001		0.004
	Arsenic (and compounds)	< 0.001		0.001
	Barium (and compounds)	< 0.001		0.001
	Benzene	0.02		0.09
	Beryllium (Table 51.1)	< 0.001		< 0.001
	Cadmium (and compounds)	< 0.001		0.002
	Carbon disulfide	0.003		0.01
	Carbon tetrachloride	< 0.001		< 0.01

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0005 L03004/L03005	Chloroform	0.001		< 0.01
	Chromium VI (and compounds)	< 0.001		0.003
	Cobalt compounds	< 0.001		< 0.01
	Copper (and compounds)	< 0.001		0.003
	Cumene	< 0.001		< 0.01
	Dibutyl phthalate	< 0.001		< 0.01
	Dichloromethane	0.02		0.11
	Ethyl benzene	< 0.001		< 0.01
	Formaldehyde	0.33		1.44
	Hydrochloric acid	4.30		18.83
	Hydrofluoric acid	0.04		0.16
	Hydrogen sulfide	14.70		64.37
	Iodomethane	0.02		0.08
	Isophorone	< 0.001		< 0.01
	Lead compounds	< 0.001		< 0.01
	Manganese (and compounds)	0.02		0.08
	Mercury (and compounds)	< 0.001		0.004
	Methanol	1.02		4.48
	Methyl bromide	0.02		0.08
	Methyl chloride	1.46		6.40
	Methyl ethyl ketone	0.05		0.23
	Methyl isobutyl ketone	0.001		< 0.01
	Naphthalene	0.10		* 0.43
	Nickel (and compounds)	0.003		0.013
	Phenol	0.19		0.82
	Phosphorus	< 0.001		< 0.01
	Polynuclear Aromatic Hydrocarbons	0.18		0.776
	Propionaldehyde	< 0.001		< 0.01
	Selenium (and compounds)	< 0.001		< 0.001
	Styrene	0.02		0.11
	Sulfuric acid	1.44		6.33
	Tetrachloroethylene	0.02		0.07
	Toluene	0.01		0.06
	Total reduced sulfur	14.70		64.37

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0005 L03004/L03005	Trichloroethylene	< 0.001		< 0.01
	Xylene (mixed isomers)	0.02		0.07
	Zinc (and compounds)	0.02		0.08
	n-Hexane	0.01		0.05
GRP 0006 L03007/L03008	1,1,1-Trichloroethane	0.001		< 0.01
	1,2,4-Trichlorobenzene	0.06		0.25
	2,2,4-Trimethylpentane	0.01		0.04
	Acetaldehyde	1.00		4.39
	Antimony (and compounds)	0.001		0.006
	Arsenic (and compounds)	< 0.001		0.001
	Barium (and compounds)	< 0.001		0.001
	Benzene	0.03		0.15
	Beryllium (Table 51.1)	< 0.001		< 0.001
	Cadmium (and compounds)	< 0.001		0.002
	Chloroform	0.002		< 0.01
	Chromium VI (and compounds)	< 0.001		0.004
	Copper (and compounds)	0.001		0.005
	Dichloromethane	0.04		0.18
	Formaldehyde	0.16		0.69
	Hydrochloric acid	3.16		13.86
	Hydrofluoric acid	0.04		0.16
	Hydrogen sulfide	3.23		14.14
	Lead compounds	0.002		< 0.01
	Manganese (and compounds)	0.003		0.01
	Mercury (and compounds)	0.001		0.006
	Methanol	1.00		4.39
	Methyl ethyl ketone	0.06		0.28
	Methyl isobutyl ketone	0.002		< 0.01
	Naphthalene	0.03		0.12
	Nickel (and compounds)	0.002		0.009
	Polynuclear Aromatic Hydrocarbons	0.02		0.088
	Selenium (and compounds)	< 0.001		< 0.001
	Styrene	0.03		0.13
	Sulfuric acid	2.22		9.70

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0006 L03007/L03008	Tetrachloroethylene	0.03		0.13
	Toluene	0.02		0.07
	Total reduced sulfur	3.23		14.14
	Xylene (mixed isomers)	0.03		0.12
	Zinc (and compounds)	0.02		0.09
	n-Hexane	0.02		0.09
GRP 0007 GRP 007	1,2,4-Trichlorobenzene	0.004		< 0.02
	Acetaldehyde	0.03		0.13
	Acrolein	< 0.001		0.003
	Antimony (and compounds)	< 0.001		< 0.001
	Arsenic (and compounds)	< 0.001		< 0.001
	Barium (and compounds)	0.002		0.010
	Benzene	0.001		0.040
	Beryllium (Table 51.1)	< 0.001		< 0.001
	Cadmium (and compounds)	< 0.001		0.002
	Carbon disulfide	0.01		0.06
	Chlorobenzene	< 0.001		0.002
	Chloroform	< 0.06		< 0.25
	Chromium VI (and compounds)	0.001		0.005
	Cobalt compounds	< 0.001		< 0.01
	Copper (and compounds)	0.003		0.013
	Dichloromethane	< 0.001		< 0.01
	Formaldehyde	0.05		0.23
	Hydrogen sulfide	3.31		14.48
	Lead compounds	0.02		0.07
	Manganese (and compounds)	0.01		0.05
	Mercury (and compounds)	< 0.001		< 0.001
	Methanol	2.21		9.67
	Methyl bromide	0.01		0.02
	Methyl chloride	0.05		0.23
	Methyl ethyl ketone	0.05		< 0.21
	Methyl isobutyl ketone	0.001		< 0.01
	Naphthalene (and Methyl napthalenes)	0.41		1.80
	Nickel (and compounds)	0.01		0.022

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
GRP 0007 GRP 007	Phenol	0.03		0.11
	Phosphorus	0.24		1.04
	Polynuclear Aromatic Hydrocarbons	0.15		0.663
	Selenium (and compounds)	< 0.001		< 0.001
	Styrene	0.002		< 0.01
	Tetrachloroethylene	0.01		0.04
	Toluene	< 0.001		< 0.01
	Total reduced sulfur	10.44		45.71
	Xylene (mixed isomers)	0.01		0.03
	Zinc (and compounds)	0.02		0.09
SCN 0001 L03001SS	n-Hexane	< 0.001		< 0.01
	1,1,1-Trichloroethane		< 0.001	
	1,1,2-Trichloroethane		< 0.001	
	1,2,4-Trichlorobenzene		< 0.001	
	1,2-Dichloroethane		< 0.001	
	Acetaldehyde		0.03	
	Acetophenone		0.001	
	Acrolein		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		< 0.001	
	Benzene		0.001	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Carbon disulfide		< 0.001	
	Carbon tetrachloride		< 0.001	
	Chlorobenzene		< 0.001	
	Chloroform		< 0.001	
	Chromium VI (and compounds)		< 0.001	
	Cobalt compounds		< 0.001	
	Copper (and compounds)		< 0.001	
	Cresol		0.02	
	Dichloromethane		< 0.001	
	Ethyl benzene		0.002	
	Formaldehyde		0.04	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0001 L03001SS	Hydrogen sulfide		0.01	
	Manganese (and compounds)		< 0.001	
	Mercury (and compounds)		< 0.001	
	Methanol		1.37	
	Methyl chloride		< 0.001	
	Methyl ethyl ketone		0.01	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene		< 0.001	
	Nickel (and compounds)		< 0.001	
	Phenol		0.002	
	Polynuclear Aromatic Hydrocarbons		< 0.001	
	Propionaldehyde		0.001	
	Selenium (and compounds)		< 0.001	
	Styrene		< 0.001	
	Tetrachloroethylene		< 0.001	
	Toluene		0.002	
	Total reduced sulfur		0.44	
	Trichloroethylene		< 0.001	
	Vinyl chloride		< 0.001	
	Xylene (mixed isomers)		< 0.001	
SCN 0002 L03002SS	Zinc (and compounds)		0.02	
	n-Hexane		1.00	
	1,1,1-Trichloroethane		< 0.001	
	1,1,2-Trichloroethane		< 0.001	
	1,2,4-Trichlorobenzene		< 0.001	
	1,2-Dichloroethane		< 0.001	
	Acetaldehyde		0.03	
	Acetophenone		0.001	
	Acrolein		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		< 0.001	
	Benzene		0.001	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0002 L03002SS	Carbon disulfide		< 0.001	
	Carbon tetrachloride		< 0.001	
	Chlorobenzene		< 0.001	
	Chloroform		< 0.001	
	Chromium VI (and compounds)		< 0.001	
	Cobalt compounds		< 0.001	
	Copper (and compounds)		< 0.001	
	Cresol		0.02	
	Dichloromethane	< 0.001	< 0.001	< 0.01
	Ethyl benzene		0.002	
	Formaldehyde		0.04	
	Hydrogen sulfide		0.01	
	Manganese (and compounds)		< 0.001	
	Mercury (and compounds)		< 0.001	
	Methanol		1.37	
	Methyl chloride		< 0.001	
	Methyl ethyl ketone		0.01	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene		< 0.001	
	Nickel (and compounds)		0.001	
	Phenol		0.002	
	Polynuclear Aromatic Hydrocarbons		< 0.001	
	Propionaldehyde		< 0.001	
	Selenium (and compounds)		< 0.001	
	Styrene		< 0.001	
	Tetrachloroethylene		< 0.001	
	Toluene		0.002	
	Total reduced sulfur		0.44	
	Trichloroethylene		< 0.001	
	Vinyl chloride		< 0.001	
	Xylene (mixed isomers)		< 0.001	
	n-Hexane		1.00	
SCN 0003 L04002SS	Acetaldehyde		0.02	
	Acrolein		< 0.001	

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0003 L04002SS	Antimony (and compounds)		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		0.001	
	Benzene		0.01	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Carbon disulfide		0.01	
	Carbon tetrachloride		0.05	
	Chlorobenzene		< 0.001	
	Chloroform		0.07	
	Chromium VI (and compounds)		< 0.001	
	Cobalt compounds		< 0.001	
	Copper (and compounds)		0.002	
	Cumene		0.003	
	Formaldehyde		0.03	
	Hydrogen sulfide		2.86	
	Lead compounds		0.01	
	Manganese (and compounds)		0.01	
	Mercury (and compounds)		< 0.001	
	Methanol		2.53	
	Methyl ethyl ketone		0.060	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene (and Methyl napthalenes)		0.25	
	Nickel (and compounds)		0.003	
	Phenol		0.02	
	Phosphorus		0.14	
	Selenium (and compounds)		< 0.001	
	Styrene		0.001	
	Tetrachloroethylene		0.01	
	Toluene		< 0.001	
	Total reduced sulfur		10.60	
	Xylene (mixed isomers)		0.003	
	Zinc (and compounds)		0.01	
	n-Hexane		< 0.001	

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AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0004 L04003SS	1,2,4-Trichlorobenzene		0.003	
	Acetaldehyde		0.02	
	Acrolein		< 0.001	
	Antimony (and compounds)		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		0.001	
	Benzene		0.005	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Carbon disulfide		0.01	
	Carbon tetrachloride		0.05	
	Chlorobenzene		< 0.001	
	Chloroform		0.07	
	Chromium VI (and compounds)		< 0.001	
	Cobalt compounds		< 0.001	
	Copper (and compounds)		0.002	
	Cresol		0.004	
	Cumene		0.003	
	Formaldehyde		0.03	
	Hydrogen sulfide		2.12	
	Lead compounds		0.01	
	Manganese (and compounds)		0.01	
	Mercury (and compounds)		< 0.001	
	Methanol		2.53	
	Methyl ethyl ketone		0.06	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene (and Methyl naphtalenes)		0.25	
	Nickel (and compounds)		0.003	
	Phenol		0.02	
	Phosphorus		0.14	
	Polynuclear Aromatic Hydrocarbons		0.09	
	Selenium (and compounds)		< 0.001	
	Styrene		0.001	
	Tetrachloroethylene		0.01	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0004 L04003SS	Toluene		< 0.001	
	Total reduced sulfur		9.29	
	Xylene (mixed isomers)		0.003	
	Zinc (and compounds)		0.01	
	n-Hexane		< 0.001	
SCN 0005 L03003SS	1,1,1-Trichloroethane		0.001	
	1,1,2-Trichloroethane		< 0.001	
	1,2,4-Trichlorobenzene		< 0.001	
	1,2-Dichloroethane		< 0.001	
	Acetaldehyde		2.32	
	Acetophenone		0.002	
	Acrolein		0.01	
	Arsenic (and compounds)		0.01	
	Barium (and compounds)		0.33	
	Benzene		0.06	
	Beryllium (Table 51.1)		0.02	
	Cadmium (and compounds)		0.002	
	Carbon disulfide		0.13	
	Carbon tetrachloride		0.06	
	Chlorinated Dibenzo-P-Dioxins		< 0.001	
	Chlorinated dibenzofurans		< 0.001	
	Chlorobenzene		< 0.001	
	Chloroform		0.07	
	Chromium VI (and compounds)		0.01	
	Cobalt compounds		0.01	
	Copper (and compounds)		0.04	
	Cresol		0.02	
	Cumene		0.01	
	Dibutyl phthalate		0.03	
	Dichloromethane		0.80	
	Ethyl benzene		0.003	
	Formaldehyde		0.35	
	Hydrochloric acid		0.35	
	Hydrogen sulfide		0.005	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0005 L03003SS	Lead compounds		0.03	
	Manganese (and compounds)		0.77	
	Mercury (and compounds)		< 0.001	
	Methanol		4.85	
	Methyl chloride		0.05	
	Methyl ethyl ketone		0.06	
	Methyl isobutyl ketone		0.22	
	Naphthalene		0.12	
	Nickel (and compounds)		0.02	
	Phenol		0.02	
	Phosphorus		0.17	
	Polynuclear Aromatic Hydrocarbons		0.19	
	Propionaldehyde		0.001	
	Selenium (and compounds)		< 0.001	
	Styrene		0.02	
	Tetrachloroethylene		< 0.001	
	Toluene		0.01	
	Total reduced sulfur		6.41	
	Trichloroethylene		0.003	
	Vinyl chloride		< 0.001	
	Xylene (mixed isomers)		0.003	
	Zinc (and compounds)		0.32	
	n-Hexane		0.57	
SCN 0006 L03004/L03005 SS	1,1,1-Trichloroethane		< 0.001	
	1,2,4-Trichlorobenzene		0.04	
	2,2,4-Trimethylpentane	0.01		0.04
	Acetaldehyde		1.28	
	Acetophenone		< 0.001	
	Acrolein		< 0.001	
	Acrylonitrile		< 0.001	
	Aniline	< 0.001		< 0.01
	Antimony (and compounds)		0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		< 0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0006 L03004/L03005 SS	Benzene		0.03	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Carbon disulfide		0.004	
	Carbon tetrachloride		< 0.001	
	Chloroform		0.001	
	Chromium VI (and compounds)		< 0.001	
	Cobalt compounds		< 0.001	
	Copper (and compounds)		< 0.001	
	Cumene		< 0.001	
	Dibutyl phthalate		< 0.001	
	Ethyl benzene		< 0.001	
	Formaldehyde		0.41	
	Hydrochloric acid		5.40	
	Hydrofluoric acid		0.05	
	Hydrogen sulfide		18.46	
	Iodomethane	0.02		
	Isophorone		< 0.001	
	Manganese (and compounds)		0.02	
	Mercury (and compounds)		< 0.001	
	Methanol		1.28	
	Methyl bromide	0.02		0.08
	Methyl chloride		1.84	
	Methyl ethyl ketone		0.07	
	Methyl isobutyl ketone		0.002	
	Naphthalene		0.12	
	Nickel (and compounds)		0.004	
	Phenol		0.23	
	Phosphorus		< 0.001	
	Polynuclear Aromatic Hydrocarbons		0.22	
	Propionaldehyde		< 0.001	
	Selenium (and compounds)		< 0.001	
	Styrene		0.03	
	Sulfuric acid		1.81	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0006 L03004/L03005 SS	Tetrachloroethylene		0.02	
	Toluene		0.02	
	Total reduced sulfur		18.46	
	Trichloroethylene		< 0.001	
	Xylene (mixed isomers)		0.019	
	Zinc (and compounds)		0.02	
	n-Hexane		0.01	
SCN 0007 L03006SS	1,1,1-Trichloroethane		< 0.001	
	1,1,2-Trichloroethane		< 0.001	
	1,2,4-Trichlorobenzene		0.01	
	Acetaldehyde		0.05	
	Acrolein		< 0.001	
	Ammonia		3.53	
	Antimony (and compounds)		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		0.001	
	Benzene		< 0.001	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Carbon disulfide		< 0.001	
	Chlorobenzene		< 0.001	
	Chloroform		< 0.001	
	Chromium VI (and compounds)		< 0.001	
	Copper (and compounds)		< 0.001	
	Cumene		< 0.001	
	Dibutyl phthalate		0.02	
	Dichloromethane		< 0.001	
	Ethyl benzene		< 0.001	
	Formaldehyde		0.38	
	Hexachlorocyclopentadiene		0.01	
	Hydrogen sulfide		0.06	
	Lead compounds		< 0.001	
	Manganese (and compounds)		0.003	
	Mercury (and compounds)		< 0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0007 L03006SS	Methanol		0.73	
	Methyl bromide		< 0.001	
	Methyl chloride		0.01	
	Methyl ethyl ketone		0.003	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene		0.04	
	Nickel (and compounds)		< 0.001	
	Phosphorus		0.01	
	Selenium (and compounds)		< 0.001	
	Styrene		0.01	
	Tetrachloroethylene		< 0.001	
	Toluene		0.001	
	Total reduced sulfur		2.30	
	Trichloroethylene		< 0.001	
	Vinyl acetate		0.003	
	Xylene (mixed isomers)		< 0.001	
	Zinc (and compounds)		0.01	
	bis(2-ethylhexyl)phthalate		< 0.001	
	n-Hexane		< 0.001	
SCN 0008 L03007/L03008 SS	1,1,1-Trichloroethane	0.001		< 0.01
	1,2,4-Trichlorobenzene		0.07	
	2,2,4-Trimethylpentane	0.01		0.04
	Acetaldehyde		1.25	
	Antimony (and compounds)		0.002	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		< 0.001	
	Benzene		0.04	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Chloroform		0.003	
	Chromium VI (and compounds)		0.001	
	Copper (and compounds)		0.001	
	Dichloromethane		0.05	
	Formaldehyde		0.20	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0008 L03007/L03008 SS	Hydrochloric acid		3.96	
	Hydrogen sulfide		4.04	
	Lead compounds		0.002	
	Manganese (and compounds)		0.003	
	Mercury (and compounds)		0.002	
	Methanol		1.25	
	Methyl ethyl ketone		0.08	
	Methyl isobutyl ketone		0.002	
	Naphthalene		0.04	
	Nickel (and compounds)		0.003	
	Polynuclear Aromatic Hydrocarbons		0.03	
	Selenium (and compounds)		< 0.001	
	Styrene		0.04	
	Sulfuric acid		2.77	
	Tetrachloroethylene		0.04	
	Toluene		0.02	
	Total reduced sulfur		4.04	
	Xylene (mixed isomers)		0.034	
	Zinc (and compounds)		0.03	
	n-Hexane		0.03	
SCN 0009 L03009 SS	1,1,1-Trichloroethane		< 0.001	
	1,1,2-Trichloroethane		< 0.001	
	1,2,4-Trichlorobenzene		0.01	
	2,2,4-Trimethylpentane	< 0.001		< 0.01
	Acetaldehyde		0.05	
	Acrolein		< 0.001	
	Ammonia		3.23	
	Antimony (and compounds)		< 0.001	
	Arsenic (and compounds)		< 0.001	
	Barium (and compounds)		0.001	
	Benzene		< 0.001	
	Beryllium (Table 51.1)		< 0.001	
	Cadmium (and compounds)		< 0.001	
	Carbon disulfide		< 0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0009 L03009 SS	Chlorobenzene		< 0.001	
	Chloroform		< 0.001	
	Chloroprene	< 0.001	< 0.001	< 0.01
	Chromium VI (and compounds)		< 0.001	
	Copper (and compounds)		< 0.001	
	Cumene		< 0.001	
	Dibutyl phthalate		0.02	
	Dichloromethane		< 0.001	
	Ethyl benzene		< 0.001	
	Formaldehyde		0.34	
	Hexachlorocyclopentadiene		0.005	
	Hydrogen sulfide		0.06	
	Lead compounds		< 0.001	
	Manganese (and compounds)		0.003	
	Mercury (and compounds)		< 0.001	
	Methanol		0.66	
	Methyl bromide		< 0.001	
	Methyl chloride		0.01	
	Methyl ethyl ketone		0.002	
	Methyl isobutyl ketone		< 0.001	
	Naphthalene		0.04	
	Nickel (and compounds)		< 0.001	
	Phosphorus		0.01	
	Propionaldehyde	0.003		
	Selenium (and compounds)		< 0.001	
	Styrene		0.01	
	Tetrachloroethylene		< 0.001	
	Toluene		< 0.001	
	Total reduced sulfur		2.18	
	Trichloroethylene		< 0.001	
	Vinyl acetate		0.003	
	Xylene (mixed isomers)		< 0.001	
	Zinc (and compounds)		0.01	
	bis(2-ethylhexyl)phthalate		< 0.001	

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Emission Pt.	Pollutant	Avg lb/hr	Max lb/hr	Tons/Year
SCN 0009 LD3009 SS	n-Hexane		< 0.001	

Note: Emission rates in bold are from alternate scenarios and are not included in permitted totals unless otherwise noted in a footnote. Emission rates attributed to the UNF reflect the sum of the TAP/HAP limits of the individual emission points (or caps) under this permit, but do not constitute an emission cap.

Emission Rates Notes:

CRG 0001	1,1,1-Trichloroethane	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,1,1-Trichloroethane	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,1,1-Trichloroethane	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,1,2-Trichloroethane	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,1,2-Trichloroethane	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,2,4-Trichlorobenzene	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,2,4-Trichlorobenzene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,2-Dichloroethane	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	1,2-Dichloroethane	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acetaldehyde	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acetaldehyde	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acetophenone	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acetophenone	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acrolein	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acrolein	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Acrolein	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Benzene	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Benzene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Carbon disulfide	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Carbon disulfide	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Carbon disulfide	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Carbon tetrachloride	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Carbon tetrachloride	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Chlorobenzene	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Chlorobenzene	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Chlorobenzene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Chloroform	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Chloroform	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Cresol	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EMISSION RATES FOR TAP/HAP & OTHER POLLUTANTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

CRG 0001			member of the group individually. Which Months: All Year
CRG 0001	Styrene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Tetrachloroethylene	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Tetrachloroethylene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Toluene	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Toluene	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Toluene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Total reduced sulfur	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Total reduced sulfur	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Total reduced sulfur	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Trichloroethylene	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Trichloroethylene	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Vinyl chloride	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Vinyl chloride	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Xylene (mixed isomers)	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Xylene (mixed isomers)	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	Xylene (mixed isomers)	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	n-Hexane	Avg lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	n-Hexane	Max lb/hr	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year
CRG 0001	n-Hexane	Tons/Year	. This emission limitation applies to all members of CRG 1 as a whole and does not apply to each member of the group individually. Which Months: All Year

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Group: PCS0001 HVLC Sources

PCS0001 HVLC Sources

Group Members: EQT0102 EQT0103 EQT0104 EQT0117 EQT0118 EQT0119 EQT0123 EQT0124 EQT0197

- 1 [40 CFR 63.443(c)] Each source that is a member of this group shall be enclosed and its emissions shall be vented into a closed-vent system that is routed to a control device that meets the requirements specified in 40 CFR 63.443(d). The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450. Subpart S. [40 CFR 63.443(c)]

EQT0102 L02001 - A Digester Brownstock Washer System

- 2 [40 CFR 60.283(a)(1)(iii)] Permittee shall route emissions from this source to EQT 135 - No. 1 Foster Wheeler Boiler, EQT 136 - No. 2 Foster Wheeler Boiler, or EQT 137 - Bark Boiler. Subpart BB. [40 CFR 60.283(a)(1)(iii)]

EQT0103 L02002 - B Digester Brownstock Washer System

- 3 [40 CFR 60.283(a)(1)(iii)] Permittee shall route emissions from this source to EQT 135 - No. 1 Foster Wheeler Boiler, EQT 136 - No. 2 Foster Wheeler Boiler, or EQT 137 - Bark Boiler. Subpart BB. [40 CFR 60.283(a)(1)(iii)]

Group: PCS0003 L090005 - Pulping Condensates

PCS0003 L090005 - Pulping Condensates

Group Members: CRG0001 EQT0102 EQT0103 EQT0104 EQT0117 EQT0118 EQT0119 EQT0123 EQT0124 EQT0126 EQT0127 EQT0129 EQT0130 EQT0131 EQT0132 EQT0133 EQT0134 EQT0197

- 4 [40 CFR 63.446(d)(1)] Convey the pulping process condensates in a closed collection system that meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962, except as specified in 40 CFR 63.446(d)(1). Subpart S. [40 CFR 63.446(d)(1)]
5 [40 CFR 63.446(e)(2)] Discharge the pulping process condensate below the liquid surface of a biological treatment system, and measure total HAP as specified in 40 CFR 63.457(g). Subpart S. [40 CFR 63.446(e)(2)]
6 [40 CFR 63.446(e)(4)] Total HAP \geq 6.6 lb/ton (3.3 kg/Mg) of ODP removed from the pulping process condensates. Subpart S. [40 CFR 63.446(e)(4)]
Which Months: All Year Statistical Basis: None specified
Equipment/operational data monitored by CMS continuously. Equip CMS with a continuous recorder. Subpart S. [40 CFR 63.453(i)]
7 [40 CFR 63.453(i)] Which Months: All Year Statistical Basis: None specified
8 [40 CFR 63.453(l)(1)] Closed collection system: Equipment/operational data monitored by visual inspection/determination once every 30 days. Monitor the closed collection system. Subpart S. [40 CFR 63.453(l)(1)]
Which Months: All Year Statistical Basis: None specified
Comply with the inspection and monitoring requirements specified in 40 CFR 63.964, except as specified in 40 CFR 63.453(l)(1)(i) and (l)(1)(ii). Subpart S. [40 CFR 63.453(l)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

Group: PCS0003 L09005 - Pulping Condensates

PCS0003 L09005 - Pulping Condensates

- 10 [40 CFR 63.453(l)(3)] Closed collection system: Make first efforts at repair of the defect no later than 5 calendar days after detection, as specified in 40 CFR 63.964(b)(1), if an inspection required by 40 CFR 63.453 identifies visible defects, or if an instrument reading of 500 parts per million or greater above background is measured. Complete repair as soon as possible but no later than 15 calendar days after detection, except as provided in 40 CFR 63.964(b)(2). Subpart S. [40 CFR 63.453(l)(3)] Use the procedures specified in 40 CFR 63.453(n)(1) through (n)(4) to establish or reestablish the value for each operating parameter required to be monitored under 40 CFR 63.453(b) through (j), (l), and (m) or to establish appropriate parameters for 40 CFR 63.453(l), (i), (j)(2), and (m). Subpart S. [40 CFR 63.453(n)]
- Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.454(a) through (f), as applicable. Subpart S.
- Submit report: Due with the initial notification report specified under 40 CFR 63.9(b)(2) and 40 CFR 63.455(a). Submit a non-binding control strategy report containing, at a minimum, the information specified in 40 CFR 63.455(b)(1) through (b)(3) in addition to the information required in 40 CFR 63.9(b)(2). Update every two years thereafter. Subpart S. [40 CFR 63.455(b)]
- Submit report: Due with the initial notification report specified under 40 CFR 63.9(b)(2) and 40 CFR 63.455(a). Submit a non-binding control strategy report containing, at a minimum, the information specified in 40 CFR 63.455(b)(1) through (b)(3) in addition to the information required in 40 CFR 63.9(b)(2). Update every two years thereafter. Subpart S. [40 CFR 63.455(b)]
- Submit initial notification: Due as soon as practicable, but no later than 15 days, to DEQ before the performance test required in 40 CFR 63.453(p)(2) is scheduled to be conducted. Submit an initial notification of the performance test if the results of the performance test required in 40 CFR 63.453(p)(2) are used to revise the approved values or ranges of the monitoring parameters specified in 40 CFR 63.453(j)(1) or (2). Notify DEQ as soon as practicable, but no later than 24 hours, before the performance test is scheduled to be conducted to confirm the exact date and time of the performance test. Subpart S. [40 CFR 63.455(e)]
- Determine compliance with the provisions of 40 CFR 63 Subpart S by using the test methods and procedures specified in 40 CFR 63.457(a) through (n), as applicable. Subpart S.
- Equipment/operational data monitored by visual inspection/determination once initially and annually. Monitor the individual drain system as specified in 40 CFR 63.964(a)(1)(i) through (a)(1)(iv). If a defect is detected, repair the defect in accordance with the requirements of 40 CFR 63.964(b). Subpart RR. [40 CFR 63.964(a)(1)]
- Which Months: All Year Statistical Basis: None specified
- Make first efforts at repair of the defect no later than 5 calendar days after detection. Complete repair as soon as possible but no later than 15 calendar days after detection, except as provided in 40 CFR 63.964(b)(2). Subpart RR. [40 CFR 63.964(b)(1)]
- Repair the defect the next time the process or unit that is generating the regulated-material managed in the individual drain system stops operation, if repair of the defect requires emptying or temporary removal from service of the individual drain system and no alternative capacity is available at the facility site to accept the regulated-material normally managed in the individual drain system. Complete repair of the defect before the process or unit resumes operation. Subpart RR. [40 CFR 63.964(b)(2)]
- 17 [40 CFR 63.964(a)(1)]
- 18 [40 CFR 63.964(b)(1)]
- 19 [40 CFR 63.964(b)(2)]

CRG0001 L09007 - Closed Vent System

Group Members: EQT0102 EQT0103 EQT0104 EQT0117 EQT0118 EQT0119 EQT0123 EQT0126 EQT0127 EQT0129 EQT0130 EQT0131 EQT0132 EQT0133 EQT0134 EQT0137

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

Group: PCS0003 L09005 - Pulping Condensates

CRG001 L09007 - Closed Vent System

- 20 [40 CFR 63.450(b)] Enclosure: Maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). Maintain each enclosure or hood opening that was closed during the initial performance test specified in 40 CFR 63.457(a) in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs. Subpart S. [40 CFR 63.450(b)]
- 21 [40 CFR 63.450(c)] Closed-vent system: Ensure that each component is designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR 63.457(d). Subpart S. [40 CFR 63.450(c)]
- 22 [40 CFR 63.450(d)(1)] Option 1 of 2: Closed-vent system (bypass lines): Flow indication monitored by flow indicator once every 15 minutes as specified in 40 CFR 63.454(e). Install the flow indicator in the bypass line in such a way as to indicate flow in the bypass line. Subpart S. [40 CFR 63.450(d)(1)]
- 23 [40 CFR 63.450(d)(2)] Which Months: All Year Statistical Basis: None specified Option 2 of 2: Closed-vent system (bypass lines): Maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. Subpart S. [40 CFR 63.450(d)(2)]
- 24 [40 CFR 63.453(k)(1)] Enclosure: Seal or closure mechanism monitored by visual inspection/determination once every 30 days. Inspect the closure mechanism specified in 40 CFR 63.450(b) to ensure the opening is maintained in the closed position and sealed. Subpart S. [40 CFR 63.453(k)(1)]
- 25 [40 CFR 63.453(k)(2)] Which Months: All Year Statistical Basis: None specified Closed-vent system: Equipment/operational data monitored by visual inspection/determination once every 30 days and at other times as requested by the DEQ. Ensure that the inspection includes ductwork, piping, enclosures, and connections to covers for visible evidence of defects. Subpart S. [40 CFR 63.453(k)(2)]
- 26 [40 CFR 63.453(k)(3)] Which Months: All Year Statistical Basis: None specified Closed-vent system: Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. Demonstrate no detectable leaks as specified in 40 CFR 63.450(c) measured by the procedures in 40 CFR 63.457(d) for the positive pressure closed-vent system or portions of the closed-vent system. Subpart S. [40 CFR 63.453(k)(3)]
- 27 [40 CFR 63.453(k)(4)] Which Months: All Year Statistical Basis: None specified Enclosure: Equipment/operational data monitored by the regulation's specified method(s) once initially and annually. Demonstrate that each enclosure opening is maintained at negative pressure using one of the procedures specified in 40 CFR 63.457(e)(1) through (e)(4). Subpart S. [40 CFR 63.453(k)(4)]
- 28 [40 CFR 63.453(k)(5)] Which Months: All Year Statistical Basis: None specified Closed-vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination once every 30 days. Inspect the valve or closure mechanism specified in 40 CFR 63.450(d)(2) to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line. Subpart S. [40 CFR 63.453(k)(5)]
- Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

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Air - Title V Regular Permit Renewal

Group: PCS0003 L09005 - Pulping Condensates

CRG001 L09007 - Closed Vent System

- 29 [40 CFR 63.453(k)(6)] Enclosure and closed vent system: Make a first effort to repair or correct the closed-vent system as soon as practicable but no later than 5 calendar days after an inspection required by 40 CFR 63.453(k)(1) through (k)(5) identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure. Complete the repair or corrective action no later than 15 calendar days after the problem is identified. Subpart S. [40 CFR 63.453(k)(6)]
Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.454(a) through (f), as applicable. Subpart S.
Determine compliance with the provisions of 40 CFR 63 Subpart S by using the test methods and procedures specified in 40 CFR 63.457(a) through (n), as applicable. Subpart S.
Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S. Determined as MACT.

EQT0102 L02001 - A Digester Brownstock Washer System

- 33 [40 CFR 60.283(a)(1)(iii)] Permittee shall route emissions from this source to EQT 135 - No. 1 Foster Wheeler Boiler, EQT 136 - No. 2 Foster Wheeler Boiler, or EQT 137 - Bark Boiler. Subpart BB. [40 CFR 60.283(a)(1)(iii)]

EQT0103 L02002 - B Digester Brownstock Washer System

- 34 [40 CFR 60.283(a)(1)(iii)] Permittee shall route emissions from this source to EQT 135 - No. 1 Foster Wheeler Boiler, EQT 136 - No. 2 Foster Wheeler Boiler, or EQT 137 - Bark Boiler. Subpart BB. [40 CFR 60.283(a)(1)(iii)]

EQT0129 L02028 - A Digester System

- 35 [40 CFR 63.446(b)] The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]
The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP.
GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006.
Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)]
Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(i), (b)(3)(i)(A), and (b)(5)(ii). Subpart S. [40 CFR 63.446(d)(1)]
Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)]
Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

Group: PCS0003 L09005 - Pulping Condensates

EQT0129 L02028 - A Digester System

40 [40 CFR 63.453(i)(3)]

Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(i)(3)]

EQT0130 L02029 - B Digester System

41 [40 CFR 63.446(b)]

The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]

42 [40 CFR 63.446(c)(3)]

The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP.

GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)]

Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii). Subpart S. [40 CFR 63.446(d)(1)]

Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (g)(2). Subpart S. [40 CFR 63.446(d)]

Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)]

Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(i)(3)]

EQT0131 L02030 - D Digester System

47 [40 CFR 63.446(b)]

The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]

The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP.

GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)]

Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii). Subpart S. [40 CFR 63.446(d)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
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Air - Title V Regular Permit Renewal

Group: PCS0003 L09005 - Pulping Condensates

EQT0131 L02030 - D Digester System

- 50 [40 CFR 63.446(d)] Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)]
Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)]
Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(1)(3)]

EQT0133 L02032 - Evaporator Off Gases

- 53 [40 CFR 63.446(b)] The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]
The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP. GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)]
Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii). Subpart S. [40 CFR 63.446(d)(1)]
Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)]
Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)]
Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(1)(3)]

Group: PCS0002 LVHC Sources

PCS0002 LVHC Sources

Group Members: EQT0126 EQT0127 EQT0129 EQT0130 EQT0131 EQT0132 EQT0133 EQT0134

- 59 [40 CFR 63.443(c)] Each source that is a member of this group shall be enclosed and its emissions shall be vented into a closed-vent system that is routed to a control device that meets the requirements specified in 40 CFR 63.443(d). The enclosures and closed-vent system shall meet the requirements specified in 40 CFR 63.450. Subpart S. [40 CFR 63.443(c)]

SPECIFIC REQUIREMENTS

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Group: PCS0002 LVHC Sources

PCS0002 LVHC Sources

- 60 [LAC 33:III.2301.D.3.b-c] Total reduced sulfur <= 5 ppm. Emissions from each source that is a member of this group are combusted in the EQT137, L3003 - Bark Boiler, or EQT166, L04003 - Lime Kiln #2.
Which Months: All Year Statistical Basis: Twelve-hour average
Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.

EQT0129 L02028 - A Digester System

- 62 [40 CFR 63.446(b)] The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]
The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP.
GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)]
Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(ii). Subpart S. [40 CFR 63.446(d)(1)]
Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)]
Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)]
Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(l)(3)]

EQT0130 L02029 - B Digester System

- 68 [40 CFR 63.446(b)] The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]
The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP.
GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
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Group: PCS0002 LVHC Sources

EQT0130 L02029 - B Digester System

- 70 [40 CFR 63.446(d)(1)] Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii). Subpart S. [40 CFR 63.446(d)(1)] Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)] Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)] Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(i)(3)]

EQT0131 L02030 - D Digester System

- 74 [40 CFR 63.446(b)] The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)] The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP. GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)] Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii). Subpart S. [40 CFR 63.446(d)(1)] Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)] Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)] Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(i)(3)]

EQT0133 L02032 - Evaporator Off Gases

- 80 [40 CFR 63.446(b)] The pulping process condensates shall be collected and treated to meet the requirements specified in 40 CFR 63.446(c), (d), and (e). This includes each digester system, evaporator system condensate, each HVLC collection system, and each LVHC collection system. [40 CFR 63.446(b)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

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Group: PCS0002 LVHC Sources

EQT0133 L02032 - Evaporator Off Gases

- 81 [40 CFR 63.446(c)(3)] The pulping process condensates from equipment systems listed in (b)(1) through (b)(5) of this section that in total contain a total HAP mass of 3.6 kg or more of total HAP per megagram (7.2 pounds per ton) of ODP. GPI established the monitoring parameter and range required to meet the collection required as detailed in the NOCS submitted on 10/06/2006. Any changes to these parameters will be completed according to NESHAP Subpart S. [40 CFR 63.446(c)(3)] Ensure that each closed collection system meets the individual drain system requirements specified in 40 CFR 63.960, 63.961, and 63.962 of subpart RR, except design and operate closed vent systems and control devices in accordance with 40 CFR 63.443(d) and 63.450, instead of in accordance with 40 CFR 63.693 as specified in 40 CFR 63.962(a)(3)(ii), (b)(3)(ii)(A), and (b)(5)(iii). Subpart S. [40 CFR 63.446(d)(1)] Convey the pulping process condensates in a closed collection system that is designed and operated to meet the requirements specified in 40 CFR 63.446(d)(1) and (d)(2). Subpart S. [40 CFR 63.446(d)] Evaluate all new or modified pulping process condensates or changes in the annual bleached or non-bleached ODP used to comply with 40 CFR 63.446(i), to determine if they meet the applicable requirements of 40 CFR 63.446. Subpart S. [40 CFR 63.446(h)] Take the corrective actions specified in 40 CFR 63.964(b) of Subpart RR, if an inspection required by 40 CFR 63.453 identifies visible defects in the closed collection system, or if an instrument reading of 500 parts per million or greater above background is measured. Subpart S. [40 CFR 63.453(1)(3)]

ARE0006 L09007 - Closed Vent System

- 86 [40 CFR 63.443(d)(4)(i)] Ensure that this control device reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Subpart S. [40 CFR 63.443(d)(4)(i)]
Flow rate monitored by flow rate monitoring device once every 15 minutes. Monitor the scrubbing liquid flow rate using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
Which Months: All Year Statistical Basis: None specified
Flow rate recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes. Record the scrubbing liquid flow rate. Subpart MM. [40 CFR 63.864(e)(10)]
Pressure drop monitored by pressure drop instrument once every 15 minutes across the scrubber using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
Which Months: All Year Statistical Basis: None specified
Pressure drop recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes across the scrubber. Subpart MM. [40 CFR 63.864(e)(10)]
Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.
Permittee shall only fire natural gas and recycle oil in this kiln in any combination. In addition, this kiln may combust HAP emission streams in accordance with 40 CFR 63 Subpart S.
Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]
Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

ARE0006 L09007 - Closed Vent System

- 95 [40 CFR 64.7(b)] Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 96 [40 CFR 64.7(c)] Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 97 [40 CFR 64.7(d)(1)] Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 98 [40 CFR 64.9(a)] Submit report: Due on and after the date specified in 40 CFR 64.7(a) b) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 99 [40 CFR 64.9(b)(1)] Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 100 [40 CFR 64.] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency.
- 101 [40 CFR 64.] Equipment/operational data recordkeeping by electronic or hard copy daily. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years.
- 102 [40 CFR 64.] Monitoring data recordkeeping by electronic or hard copy daily. Maintain these records for a period of at least five years.
- 103 [40 CFR 64.] Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the flow rate of the scrubbing liquid, and the scrubber supply pressure necessary to assure compliance with the sulfur dioxide and total reduced sulfur limitations of this permit. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and total reduced sulfur. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test.
- 104 [40 CFR 64.] Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8.
- 105 [40 CFR 64.] Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide or total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes.

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- 106 [40 CFR 64.] pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency. Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide and total reduced sulfur. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting both recycle oil and emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting either recycle oil or emissions from PCS002 - LVHC Sources in conjunction with natural gas. Monitoring for total reduced sulfur shall be conducted daily when combusting emissions from PCS002 - LVHC Sources. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime.
- 107 [LAC 33:III.1513.C] Which Months: All Year Statistical Basis: None specified Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 108 [LAC 33:III.2301.D.1.c] Total suspended particulate <= 1.0 lb/equivalent pulp ton (0.5 kg/equivalent pulp metric ton).
- 109 [LAC 33:III.2301.D.3.d] Which Months: All Year Statistical Basis: Twelve-hour average Total reduced sulfur <= 20 ppm.
- 110 [LAC 33:III.2301.D.3.i] Which Months: All Year Statistical Basis: Twelve-hour average Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.
- 111 [LAC 33:III.5001.C.6] Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.
- 112 [LAC 33:III.501.C.6] Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 113 [LAC 33:III.501.C.6] Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 114 [LAC 33:III.501.C.6] Total suspended particulate <= 0.064 gr/dscf (0.15 g/dscm) corrected to 10 percent oxygen. Subpart MM.
- 115 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: None specified Total suspended particulate <= 0.067 gr/dscf. Permittee shall determine compliance with this limitation using EPA Reference Method 5. Determined as BACT in Permit No. PSD-LA-37.
- Which Months: All Year Statistical Basis: Hourly maximum

CRG0001 L09007 - Closed Vent System

SPECIFIC REQUIREMENTS

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CRG0001 L09007 - Closed Vent System

Group Members: EQT0102 EQT0103 EQT0104 EQT0118 EQT0119 EQT0124 EQT0126 EQT0127 EQT0130 EQT0131 EQT0132 EQT0133 EQT0134 EQT0137

- 116 [40 CFR 63.450(b)] Enclosure: Maintain negative pressure at each enclosure or hood opening as demonstrated by the procedures specified in 40 CFR 63.457(e). Maintain each enclosure or hood opening that was closed during the initial performance test specified in 40 CFR 63.457(a) in the same closed and sealed position as during the performance test at all times except when necessary to use the opening for sampling, inspection, maintenance, or repairs. Subpart S. [40 CFR 63.450(b)]
- 117 [40 CFR 63.450(c)] Closed-vent system: Ensure that each component is designed for and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million by volume above background, as measured by the procedures specified in 40 CFR 63.457(d). Subpart S. [40 CFR 63.450(c)]
- 118 [40 CFR 63.450(d)(1)] Option 1 of 2: Closed-vent system (bypass lines): Flow indication monitored by flow indicator once every 15 minutes as specified in 40 CFR 63.454(e). Install the flow indicator in the bypass line in such a way as to indicate flow in the bypass line. Subpart S. [40 CFR 63.450(d)(1)] Which Months: All Year Statistical Basis: None specified
- 119 [40 CFR 63.450(d)(2)] Option 2 of 2: Closed-vent system (bypass lines): Maintain the bypass line valve in the closed position with a car seal or a seal placed on the valve or closure mechanism in such a way that valve or closure mechanism cannot be opened without breaking the seal. Subpart S. [40 CFR 63.450(d)(2)]
- 120 [40 CFR 63.453(k)(1)] Enclosure: Seal or closure mechanism monitored by visual inspection/determination once every 30 days. Inspect the closure mechanism specified in 40 CFR 63.450(b) to ensure the opening is maintained in the closed position and sealed. Subpart S. [40 CFR 63.453(k)(1)] Which Months: All Year Statistical Basis: None specified
- 121 [40 CFR 63.453(k)(2)] Closed-vent system: Equipment/operational data monitored by visual inspection/determination once every 30 days and at other times as requested by the DEQ. Ensure that the inspection includes ductwork, piping, enclosures, and connections to covers for visible evidence of defects. Subpart S. [40 CFR 63.453(k)(2)] Which Months: All Year Statistical Basis: None specified
- 122 [40 CFR 63.453(k)(3)] Closed-vent system: Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. Demonstrate no detectable leaks as specified in 40 CFR 63.450(c) measured by the procedures in 40 CFR 63.457(d) for the positive pressure closed-vent system or portions of the closed-vent system. Subpart S. [40 CFR 63.453(k)(3)]
- 123 [40 CFR 63.453(k)(4)] Which Months: All Year Statistical Basis: None specified
- 124 [40 CFR 63.453(k)(5)] Enclosure: Equipment/operational data monitored by the regulation's specified method(s) once initially and annually. Demonstrate that each enclosure opening is maintained at negative pressure using one of the procedures specified in 40 CFR 63.457(e)(1) through (e)(4). Subpart S. [40 CFR 63.453(k)(4)] Which Months: All Year Statistical Basis: None specified
- Closed-vent system (bypass lines): Seal or closure mechanism monitored by visual inspection/determination once every 30 days. Inspect the valve or closure mechanism specified in 40 CFR 63.450(d)(2) to ensure that the valve is maintained in the closed position and the emission point gas stream is not diverted through the bypass line. Subpart S. [40 CFR 63.453(k)(5)]
- Which Months: All Year Statistical Basis: None specified

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CRG0001 L09007 - Closed Vent System

125 [40 CFR 63.453(k)(6)]

Enclosure and closed vent system: Make a first effort to repair or correct the closed-vent system as soon as practicable but no later than 5 calendar days after an inspection required by 40 CFR 63.453(k)(1) through (k)(5) identifies visible defects in ductwork, piping, enclosures or connections to covers required by 40 CFR 63.450, or if an instrument reading of 500 parts per million by volume or greater above background is measured, or if enclosure openings are not maintained at negative pressure. Complete the repair or corrective action no later than 15 calendar days after the problem is identified. Subpart S. [40 CFR 63.453(k)(6)]

126 [40 CFR 63.454]

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.454(a) through (f), as applicable. Subpart S.

127 [40 CFR 63.457]

Determine compliance with the provisions of 40 CFR 63 Subpart S by using the test methods and procedures specified in 40 CFR 63.457(a) through (n), as applicable. Subpart S.

128 [LAC 33:III.5109.A]

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S. Determined as MACT.

EQT0105 L02004 - Semi-Chem Brownstock Washer System

129 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

EQT0107 L02006 - South "A" High Density Storage

130 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

EQT0108 L02007 - North "B" High Density Storage

131 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

EQT0109 L02008 - South "B" High Density Storage

132 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

EQT0110 L02009 - D High Density Storage Chest - West

133 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

EQT0111 L02010 - D High Density Storage Chest - East

134 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

EQT0112 L02011 - D High Density Storage Chest

135 [LAC 33:III.5109.A]

No additional controls is determined as MACT.

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EQT0113 L02012 - Transition High Density Storage Chest

136 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0114 L02013 - Semi-Chem High Density Storage

137 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0115 L02014 - Brown Liquor Transfer Tank

138 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0116 L02015 - D Decker & Filtrate Chest

139 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0120 L02019 - A/B Black Liquor Filter #1

140 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0121 L02020 - A/B Black Liquor Filter #2

141 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0122 L02021 - D Liquor Filter

142 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0125 L02024 - Liquid Blend Tank

143 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0135 L03001 - No. 1 Foster Wheeler Boiler

144 [40 CFR 63.443(d)(4)(i)]

145 [LAC 33:III.1101.B]

Ensure that this control device reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Subpart S. [40 CFR 63.443(d)(4)(i)]
Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: None specified

SPECIFIC REQUIREMENTS

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EQT0135 L03001 - No. 1 Foster Wheeler Boiler

146 [LAC 33:III.1513.C]

Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shakedown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total HVLC gas firing time each month, as well as the total HVLC gas firing time for the last twelve months. Make records available for inspection by DEQ personnel.

Operating time <= 2375 hr/yr. Permittee shall not combust high volume, low concentration (HVLC) gases that are routed from PCS 1 - HVLC Sources in EQT 135 - No. 1 Foster Wheeler Boiler and EQT 136 - No. 2 Foster Wheeler Boiler for a combined amount of time that exceeds the amount set forth in this specific condition. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the total HVLC gas firing time in EQT 135 - No. 1 Foster Wheeler Boiler and EQT 136 - No. 2 Foster Wheeler Boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.

Which Month: All Year Statistical Basis: None specified

Operating time monitored by technically sound method continuously. Permittee shall monitor the total HVLC gas firing time in this boiler.

Which Month: All Year Statistical Basis: None specified

Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.

Submit report: Due annually, by the 31st of March. Report the total HVLC gas firing time in this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S. This condition shall only apply when this source combusts emissions from PCS0001. Determined as MACT.

EQT0136 L03002 - No. 2 Foster Wheeler Boiler

155 [LAC 33:III.1101.B]

Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment changes, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

Which Month: All Year Statistical Basis: None specified

Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

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EQT0136 L030002 - No. 2 Foster Wheeler Boiler

Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources, and Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Equipment/operational data recordkeeping by electronic or hard copy monthly. Keep records of the total HVLC gas firing time each month, as well as the total HVLC gas firing time for the last twelve months. Make records available for inspection by DEQ personnel.
Operating time <= 2375 hr/yr. Permittee shall not combust high volume, low concentration (HVLC) gases that are routed from PCS 1 - HVLC Sources in EQT 135 - No. 1 Foster Wheeler Boiler and EQT 136 - No. 2 Foster Wheeler Boiler for a combined amount of time that exceeds the amount set forth in this specific condition. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the total HVLC gas firing time in EQT 135 - No. 1 Foster Wheeler Boiler and EQT 136 - No. 2 Foster Wheeler Boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.

Which Months: All Year Statistical Basis: None specified
Operating time monitored by technically sound method continuously. Permittee shall monitor the total HVLC gas firing time in this boiler.

Which Months: All Year Statistical Basis: None specified
Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.
Submit report: Due annually, by the 31st of March. Report the total HVLC gas firing time in this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S. This condition shall only apply when this source combusts emissions from PCS0001. Determined as MACT.

EQT0137 L030003 - Bark Boiler

Particulate matter (10 microns or less) <= 0.10 lb/MMBTU (43 nanograms per joule) heat input derived from fossil fuel or fossil fuel and wood residue. Subpart D. [40 CFR 60.42(a)(1)]
Which Months: All Year Statistical Basis: None specified
Opacity <= 20 percent except for one six-minute period per hour of not more than 27 percent opacity. Subpart D. [40 CFR 60.42(a)(2)]
Which Months: All Year Statistical Basis: Six-minute average
Nitrogen oxides <= 0.30 lb/MMBTU (129 ng/J). Subpart D. [40 CFR 60.44(a)(2)]
Which Months: All Year Statistical Basis: None specified

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EQT0137 L03003 - Bark Boiler

168 [40 CFR 60.45(c)]

169 [40 CFR 60.45(g)]

170 [40 CFR 60.45]

171 [40 CFR 60.45]

Use the procedures in 40 CFR 60.45(c)(1) through (c)(5) for performance evaluations under 40 CFR 60.13(c) and calibration checks under 40 CFR 60.13(d). Subpart D. [40 CFR 60.45(c)]

Submit excess emission and monitoring system performance reports: Due semiannually for each six-month period in the calendar year. Postmark all semiannual reports by the 30th day following the end of each six-month period. Include the information required in 40 CFR 60.7(c). Subpart D. [40 CFR 60.45(g)]

Nitrogen oxides monitored by continuous emission monitor (CEM) continuously, except as provided in 40 CFR 60.45(b). Convert the data to the units of the applicable standard as specified in 40 CFR 60.45(e) and (f). Subpart D.

Which Month: All Year Statistical Basis: Three-hour average

Opacity: Permittee shall demonstrate compliance with the opacity standard in accordance with the Alternative Monitoring Plan approved by Diana Dutson, Director of the Enforcement Division of the Environmental Protection Agency by letter dated October 16, 1980, and by the Office of Environmental Assessment, Air Quality Assessment Division on September 24, 2007.

When combusting either wood only, or wood in combination with natural gas and/or NCGs, install, calibrate, maintain, and operate continuous monitoring systems for measuring the scrubber pressure drop and supply pressure or scrubber flowrate, approved as the alternative monitoring requirement. Continuously record the pressure drop, and supply pressure or scrubber flow rate. Report 3-hour periods where dP, and flow or supply pressure is less than 90% of the last compliant stack test.

When combusting natural gas only or natural gas and HVL/C NCGs, monitoring of scrubber operational parameters is not required. When combusting natural gas only, no PM and SO₂ control is required to meet the NSPS Subpart D limit and PSD limit for PM and SO₂ and no reporting is required.

When combusting natural gas along with LVHC NCGs and no wood, GPI will monitor the pH of the scrubber liquid. Continuously record the pH of the scrubber liquid. Report 3-hour periods where pH is less than the minimum limit set in the CAM plan.

Report quarterly operational information about the venturi scrubber on the 30th day of the month following each quarterly period. Oxygen or Carbon dioxide monitored by continuous emission monitor (CEM) continuously, except as provided in 40 CFR 60.45(b). Convert the data to the units of the applicable standard as specified in 40 CFR 60.45(e) and (f). Subpart D.

Which Month: All Year Statistical Basis: None specified

Conduct the performance tests required in 40 CFR 60.8 using as reference methods and procedures the test methods in 40 CFR 60 Appendix A or other methods and procedures as specified in 40 CFR 60.46, except as provided in 40 CFR 60.8(b). Subpart D [40 CFR 60.46(a)] Ensure that this control device reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Subpart S. [40 CFR 63.443(d)(4)(i)]

Specific QA/QC Procedures: Calibrate, operate, and maintain the instrumentation used to measure pH, scrubber liquid flow rate, scrubber supply pressure, and differential pressure across the scrubber using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]

SPECIFIC REQUIREMENTS

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EQT0137 L03003 - Bark Boiler

- 176 [40 CFR 64.4(e)] Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 177 [40 CFR 64.6(c)(1)] Either differential pressure across the scrubber or pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency. Permittee shall monitor differential pressure across the scrubber and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of particulate matter. Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide. Monitoring for particulate matter shall be conducted four (4) times per hour when combusting wood. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting emissions from PCS001 - HVLC Sources. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime. Particulate matter and sulfur dioxide are the only pollutants to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]
- Which Month: All Year Statistical Basis: None specified
- 178 [40 CFR 64.6(c)(2)] Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
- 179 [40 CFR 64.6(c)(4)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. [40 CFR 64.6(c)(4)]
- 180 [40 CFR 64.6(d)] Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the minimum differential pressure across the scrubber, the minimum scrubber liquid flow rate necessary to assure compliance with the sulfur dioxide and particulate matter limitations. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and particulate matter. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)]
- 181 [40 CFR 64.7(a)] Conduct the monitoring required under 40 CFR 64.6 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 182 [40 CFR 64.7(b)] Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 183 [40 CFR 64.7(c)] Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EQT0137 L03003 - Bark Boiler

184 [40 CFR 64.7(d)(1)]

Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

185 [40 CFR 64.7(e)]

Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide and total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

186 [40 CFR 64.9(a)]

Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]

187 [40 CFR 64.9(b)(1)]

Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years.

188 [40 CFR 64.9(b)(1)]

[40 CFR 64.9(b)(1)]
Monitoring data recordkeeping by electronic or hard copy at the approved frequency. Maintain these records for a period of at least five years.
[40 CFR 64.9(b)(1)]
Opacity <= 20 percent, except during the cleaning of a fire box or building of a new fire, soot blowing or lancing, charging of an incinerator, equipment charges, ash removal or rapping of precipitators, which may have an opacity in excess of 20 percent for not more than one six-minute period in any 60 consecutive minutes.

189 [40 CFR 64.9(b)(1)]

Which Months: All Year Statistical Basis: None specified
Total suspended particulate <= 0.6 lb/MMBTU of heat input.

190 [LAC 33.III.1101.B]

Which Months: All Year Statistical Basis: None specified
Sulfur dioxide <= 2000 ppmv at standard conditions.
Which Months: All Year Statistical Basis: Three-hour average
Determine compliance with the appropriate emission limitation in LAC 33.III.1503.C using the methods listed in LAC 33.III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.

191 [LAC 33.III.1313.C]

Permittee shall determine compliance with the sulfur dioxide limitation by performing a compliance test on this source for sulfur dioxide in accordance with LAC 33.III.1503.D.4. Permittee shall use the emission factor determined as a result of this compliance test in conjunction with the heat input to this source in order to determine actual sulfur dioxide emissions.

SPECIFIC REQUIREMENTS

AJ ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

EQT0137 L03003 - Bark Boiler

- 195 [LAC 33:III.1513.A.2] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- 196 [LAC 33:III.1513.A.2] Submit compliance determination results: Due no later than 90 days after completion of test.
- 197 [LAC 33:III.1513.B.3] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 198 [LAC 33:III.1513.B.3] Fuel rate recordkeeping by electronic or hard copy monthly. Record the actual sulfur dioxide emissions.
- 199 [LAC 33:III.1513.E] Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
- 200 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:III. Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 201 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III. Chapter 15.
- 202 [LAC 33:III.2301.D.1.d] Comply with LAC 33:III.1313.
- 203 [LAC 33:III.2301.D.2] Do not exceed the limits set forth in LAC 33:III.1503.C.
- 204 [LAC 33:III.2301.D.3.h] Two (2) percent of all 12-hour averages per quarter year above the specified level, under conditions of proper operation and maintenance, exclusive of start-ups, shut downs and malfunctions are not considered to be violations of the emission limitation.
- 205 [LAC 33:III.501.C.6] Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shakedown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 206 [LAC 33:III.501.C.6] Permittee shall demonstrate compliance with all applicable opacity standards that apply to this source in accordance with the Alternative Monitoring Plan approved by Diana Dutton, Director of the Enforcement Division of the Environmental Protection Agency by letter dated October 16, 1980, and by the Office of Environmental Assessment, Air Quality Assessment Division on September 24, 2007.
- 207 [LAC 33:III.501.C.6] Permittee shall only fire natural gas, finished pulp that has been washed of all cooking liquor, and wood in this boiler, in addition to small amounts of narcotics combusted in support of local law enforcement efforts. Wood is defined to be materials that can be obtained from a tree without any form of chemical treatment or extraction such as non-chemically treated wood and bark.
- 208 [LAC 33:III.501.C.6] Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 209 [LAC 33:III.501.C.6] Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

EQT0137 L03003 - Bark Boiler

210	[LAC 33:III.509]	Particulate matter (10 microns or less) <= 0.10 lb/MMBTU. Permittee shall determine compliance with this limitation using EPA reference Method 5. Determined as BACT in Permit No. PSD-LA-37.
211	[LAC 33:III.509]	Which Months: All Year Statistical Basis: Hourly maximum Sulfur dioxide <= 0.73 lb/MMBTU. Permittee shall determine compliance with this limitation using EPA Reference Method 6. Determined as BACT in Permit No. PSD-LA-37.
212	[LAC 33:III.5109.A]	Which Months: All Year Statistical Basis: Hourly maximum Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S. This condition shall only apply when this source combusts emissions from sources that are members of PCS 001 or PCS 002. Determined as MACT.

EQT0138 L03004 - No. 4 Recovery Boiler Stack A

213	[40 CFR 63.862(a)(1)(i)(A)]	Total suspended particulate <= 0.044 gr/dscf (0.10 g/dscm), corrected to 8 percent oxygen. Subpart MM. [40 CFR 63.862(a)(1)(i)(A)]
214	[40 CFR 63.864(d)]	Which Months: All Year Statistical Basis: None specified Opacity monitored by continuous opacity monitor (COM) continuously. Ensure that each COMS is operated according to the provisions in 40 CFR 63.6(h) and 40 CFR 63.8, and completes a minimum of one cycle of sampling and analyzing for each successive 10-second period as specified in 40 CFR 63.8(c)(4)(i). Reduce the COMS data as specified in 40 CFR 63.8(g)(2). Subpart MM. [40 CFR 63.864(d)]
215	[40 CFR 63.864(d)]	Which Months: All Year Statistical Basis: None specified Opacity recordkeeping by continuous opacity monitor (COM) continuously. Subpart MM. [40 CFR 63.864(d)]
216	[LAC 33:III.1503.C]	Sulfur dioxide <= 2000 ppmv at standard conditions.
217	[LAC 33:III.1503.D.1]	Which Months: All Year Statistical Basis: Three-hour average Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
218	[LAC 33:III.1511.C.3]	Permittee shall demonstrate compliance with the sulfur dioxide limitations of LAC 33:III.Chaper 15 by conducting a performance test in accordance with the approved test methods set forth in LAC 33:III.Chapter 15, Table 4 once every five (5) years.
219	[LAC 33:III.1513.A.2]	Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
220	[LAC 33:III.1513.A.2]	Submit compliance determination results: Due no later than 90 days after completion of test.
221	[LAC 33:III.1513.B.3]	Permittee shall record the results of each performance test conducted in order to show compliance with the requirements of LAC 33:III.Chapter 15.
222	[LAC 33:III.1513.E]	Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
223	[LAC 33:III.1513.E]	Submit excess emissions report: Due quarterly in accordance with LAC 33:III.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
224	[LAC 33:III.1513.E]	Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-Y3

Air - Title V Regular Permit Renewal

EQT0138 L03004 - No. 4 Recovery Boiler Stack A

225 [LAC 33:III.501.C.6]

Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

EQT0139 L03005 - No. 4 Recovery Boiler Stack B

229 [40 CFR 63.862(a)(1)(i)(A)]

Total suspended particulate <= 0.044 gr/dscf (0.10 g/dscm), corrected to 8 percent oxygen. Subpart MM. [40 CFR 63.862(a)(1)(i)(A)]
Which Months: All Year Statistical Basis: None specified
Opacity monitored by continuous opacity monitor (COM) continuously. Ensure that each COMS is operated according to the provisions in 40 CFR 63.6(h) and 40 CFR 63.8, and completes a minimum of one cycle of sampling and analyzing for each successive 10-second period as specified in 40 CFR 63.8(c)(4)(i). Reduce the COMS data as specified in 40 CFR 63.8(g)(2). Subpart MM. [40 CFR 63.864(d)]

Which Months: All Year Statistical Basis: None specified
Opacity recordkeeping by continuous opacity monitor (COM) continuously. Subpart MM. [40 CFR 63.864(d)]
Sulfur dioxide <= 2000 ppmv at standard conditions.
Which Months: All Year Statistical Basis: Three-hour average
Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.

Permittee shall demonstrate compliance with the sulfur dioxide limitations of LAC 33:III.Chapter 15 by conducting a performance test in accordance with the approved test methods set forth in LAC 33:III.Chapter 15, Table 4 once every five (5) years.

Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.

Submit compliance determination results: Due no later than 90 days after completion of test.

Permittee shall record the results of each performance test conducted in order to show compliance with the requirements of LAC 33:III.Chapter 15.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20059001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EQT0139 L03005 - No. 4 Recovery Boiler Stack B

238 [LAC 33:III.1513.E]

239 [LAC 33:III.1513.E]

240 [LAC 33:III.501.C.6]

241 [LAC 33:III.501.C.6]

242 [LAC 33:III.501.C.6]

243 [LAC 33:III.501.C.6]

244 [LAC 33:III.5109.A]

Make all compliance data available to a representative of DEQ or the U.S. EPA on request.

Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.

Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.

Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

EQT0140 L03006 - No. 4 Recovery Boiler Smelt Dissolving Tank

245 [40 CFR 63.862(a)(1)(i)(B)]

246 [40 CFR 63.864(e)(10)]

247 [40 CFR 63.864(e)(10)]

248 [40 CFR 63.864(e)(10)]

249 [40 CFR 63.864(e)(10)]

250 [LAC 33:III.2301.D.1.b]

Total suspended particulate <= 0.20 lb/ton (0.10 kg/Mg) of black liquor solids fired. Subpart MM. [40 CFR 63.862(a)(1)(i)(B)]

Which Months: All Year Statistical Basis: None specified Flow rate monitored by flow rate monitoring device once every 15 minutes. Monitor the scrubbing liquid flow rate using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]

Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes. Record the scrubbing liquid flow rate. Subpart MM. [40 CFR 63.864(e)(10)]

Pressure drop monitored by pressure drop instrument once every 15 minutes across the scrubber using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]

Which Months: All Year Statistical Basis: None specified Pressure drop recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes across the scrubber. Subpart MM. [40 CFR 63.864(e)(10)]

Total suspended particulate <= 0.5 lb/equivalent pulp ton (0.25 kg/equivalent pulp metric ton)

Which Months: All Year Statistical Basis: Twelve-hour average

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

EQT0140 L03006 - No. 4 Recovery Boiler Smelt Dissolving Tank

251 [LAC 33:III.2301.D.3.f]

Total reduced sulfur <= 0.016 g/kg of black liquor solids fired. Alternatively, compliance with the particulate emission limits of LAC 33:III.2301.D.1.b by a scrubbing device employing fresh water as the scrubbing medium make up will be accepted as evidence of adequate TRS control.

Which Months: All Year Statistical Basis: Twelve-hour average

Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.

Submit report: Due annually, by the 31st of March. Report the total throughput for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

Throughput < 502000 tons/yr of black liquor solids. This limitation shall apply at all times, including periods of startup and shutdown.

Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if total throughput exceeds the maximum listed in this specific condition for any twelve consecutive month period.

Which Months: All Year Statistical Basis: Annual maximum

Throughput monitored by technically sound method continuously.

Which Months: All Year Statistical Basis: None specified

Throughput recordkeeping by electronic or hard copy monthly. Keep records of the total throughput each month, as well as the total throughput for the last twelve months. Make records available for inspection by DEQ personnel.

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determine as MACT.

EQT0141 L03007 - No. 5 Recovery Boiler Stack A

258 [40 CFR 63.862(a)(1)(i)(A)]

Total suspended particulate <= 0.044 gr/dscf (0.10 g/dscm), corrected to 8 percent oxygen. Subpart MM. [40 CFR 63.862(a)(1)(i)(A)]
Which Months: All Year Statistical Basis: None specified
Opacity monitored by continuous opacity monitor (COM) continuously. Ensure that each COMS is operated according to the provisions in 40 CFR 63.6(h) and 40 CFR 63.8, and completes a minimum of one cycle of sampling and analyzing for each successive 10-second period as specified in 40 CFR 63.8(c)(4)(i). Reduce the COMS data as specified in 40 CFR 63.8(g)(2). Subpart MM. [40 CFR 63.864(d)]

Which Months: All Year Statistical Basis: None specified

Opacity recordkeeping by continuous opacity monitor (COM) continuously. Subpart MM. [40 CFR 63.864(d)]
Sulfur dioxide <= 2000 ppmv at standard conditions.

Which Months: All Year Statistical Basis: Three-hour average

Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.

Permittee shall demonstrate compliance with the sulfur dioxide limitations of LAC 33:III.Chapter 15 by conducting a performance test in accordance with the approved test methods set forth in LAC 33:III.Chapter 15, Table 4 once every five (5) years.

Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.

Submit compliance determination results: Due no later than 90 days after completion of test.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

EQT0141 L03007 - No. 5 Recovery Boiler Stack A

- 266 [LAC 33:III.1513.B.3] Permittee shall record the results of each performance test conducted in order to show compliance with the requirements of LAC 33:III.Chapter 15.
- 267 [LAC 33:III.1513.E] Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
- 268 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:III.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 269 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- 270 [LAC 33:III.2301.D.2] Do not exceed the limits set forth in LAC 33:III.1503.C.
- 271 [LAC 33:III.501.C.6] Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 272 [LAC 33:III.501.C.6] Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.
- 273 [LAC 33:III.501.C.6] Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.
- 274 [LAC 33:III.5109.A] Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

EQT0142 L03008 - No. 5 Recovery Boiler Stack B

- 275 [40 CFR 63.862(a)(1)(i)(A)] Total suspended particulate <= 0.044 g/dscf (0.10 g/dscm), corrected to 8 percent oxygen. Subpart MM. [40 CFR 63.862(a)(1)(i)(A)]
- 276 [40 CFR 63.864(d)] Which Months: All Year Statistical Basis: None specified Opacity monitored by continuous opacity monitor (COM) continuously. Ensure that each COMS is operated according to the provisions in 40 CFR 63.6(h) and 40 CFR 63.8, and completes a minimum of one cycle of sampling and analyzing for each successive 10-second period as specified in 40 CFR 63.8(c)(4)(i). Reduce the COMS data as specified in 40 CFR 63.8(g)(2). Subpart MM. [40 CFR 63.864(d)]
- 277 [40 CFR 63.864(d)] Which Months: All Year Statistical Basis: None specified Opacity recordkeeping by continuous opacity monitor (COM) continuously. Subpart MM. [40 CFR 63.864(d)]
- 278 [LAC 33:III.1503.C] Sulfur dioxide <= 2000 ppmv at standard conditions.
- Which Months: All Year Statistical Basis: Three-hour average

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EQT0142 L03008 - No. 5 Recovery Boiler Stack B

Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.

Permittee shall demonstrate compliance with the sulfur dioxide limitations of LAC 33:III.Chapter 15 by conducting a performance test in accordance with the approved test methods set forth in LAC 33:III.Chapter 15, Table 4 once every five (5) years.

Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.

Submit compliance determination results: Due no later than 90 days after completion of test.

Permittee shall record the results of each performance test conducted in order to show compliance with the requirements of LAC 33:III.Chapter 15.

Make all compliance data available to a representative of DEQ or the U.S. EPA on request.

Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.

Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.

Do not exceed the limits set forth in LAC 33:III.1503.C.

Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

EQT0143 L03009 - No. 5 Recovery Boiler Smelt Dissolving Tank

Total suspended particulate <= 0.2 lb/ton of black liquor solids (dry weight) [0.1 g/kg black liquor solids (dry weight)]. Subpart BB. [40 CFR 60.282(a)(2)]

Which Months: All Year Statistical Basis: None specified

279 [LAC 33:III.1503.D.1]

280 [LAC 33:III.1511.C.3]

281 [LAC 33:III.1513.A.2]

282 [LAC 33:III.1513.A.2]

283 [LAC 33:III.1513.B.3]

284 [LAC 33:III.1513.E]

285 [LAC 33:III.1513.E]

286 [LAC 33:III.1513.E]

287 [LAC 33:III.2301.D.2]

288 [LAC 33:III.501.C.6]

289 [LAC 33:III.501.C.6]

290 [LAC 33:III.501.C.6]

291 [LAC 33:III.5109.A]

292 [40 CFR 60.282(a)(2)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER2050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

EQ0143 L03009 - No. 5 Recovery Boiler Smelt Dissolving Tank

293	[40 CFR 60.283(a)(4)]	Total reduced sulfur <= 0.033 lb/ton black liquor solids as H ₂ S (0.016 g/kg black liquor solids as H ₂ S). Subpart BB. [40 CFR 60.283(a)(4)]
294	[40 CFR 60.284(b)(2)(i)]	Which Months: All Year Statistical Basis: None specified Pressure monitored by pressure instrument continuously. Monitor the pressure loss of the gas stream. Ensure that the monitoring device is certified by the manufacturer to be accurate to within a gage pressure of +/-500 pascals (ca. +/-2 inches water gage pressure). Subpart BB. [40 CFR 60.284(b)(2)(i)]
295	[40 CFR 60.284(b)(2)(ii)]	Which Months: All Year Statistical Basis: None specified Pressure monitored by pressure instrument continuously. Monitor the scrubbing liquid supply pressure to the control equipment. Ensure that the monitoring device is certified by the manufacturer to be accurate within +/-15 percent of design scrubbing liquid supply pressure. Locate the pressure sensor or tap close to the scrubber liquid discharge point. Subpart BB. [40 CFR 60.284(b)(2)(ii)]
296	[40 CFR 60.284(c)(4)]	Which Months: All Year Statistical Basis: None specified Pressure recordkeeping by electronic or hard copy once every shift during operation. Record the measurements obtained from the continuous monitoring devices installed under 40 CFR 60.284(b)(2). Subpart BB. [40 CFR 60.284(c)(4)]
297	[40 CFR 60.284(d)]	Submit Report: Due semiannually. Submit reports of any periods of excess emissions as defined in 40 CFR 60.284(d), for the purpose of reports required under 40 CFR 60.7(c). Subpart BB. [40 CFR 60.284(d)]
298	[40 CFR 60.284(f)]	Follow the procedures under 40 CFR 60.13 for installation, evaluation, and operation of the continuous monitoring systems required under 40 CFR 60.284. Subpart BB. [40 CFR 60.284(f)]
299	[40 CFR 60.285(a)]	Use as reference methods and procedures the test methods in appendix A of 40 CFR 60 or other methods and procedures in 40 CFR 60.285, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart BB. [40 CFR 60.285(a)]
300	[40 CFR 60.285(c)]	Determine compliance with the particulate matter standard in 40 CFR 60.282(a)(2) using the methods and procedures specified in 40 CFR 60.285(c)(1) to (c)(3). Subpart BB. [40 CFR 60.285(c)]
301	[40 CFR 60.285(e)]	Determine compliance with the TRS standards in 40 CFR 60.283(a)(1)(vi) and (4) using the methods and procedures specified in 40 CFR 60.285(e)(1) to (e)(4). Subpart BB. [40 CFR 60.285(e)]
302	[40 CFR 63.862(a)(1)(i)(B)]	Total suspended particulate <= 0.20 lb/ton (0.10 kg/Mg) of black liquor solids fired. Subpart MM. [40 CFR 63.862(a)(1)(i)(B)]
303	[40 CFR 63.864(e)(10)]	Which Months: All Year Statistical Basis: None specified Flow rate monitored by flow rate monitoring device once every 15 minutes. Monitor the scrubbing liquid flow rate using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
304	[40 CFR 63.864(e)(10)]	Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes. Record the scrubbing liquid flow rate. Subpart MM. [40 CFR 63.864(e)(10)]
305	[40 CFR 63.864(e)(10)]	Pressure drop monitored by pressure drop instrument once every 15 minutes across the scrubber using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
306	[40 CFR 63.864(e)(10)]	Which Months: All Year Statistical Basis: None specified Pressure drop recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes across the scrubber. Subpart MM. [40 CFR 63.864(e)(10)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-000001-V3

Air - Title V Regular Permit Renewal

EQT0143 L03009 - No. 5 Recovery Boiler Smelt Dissolving Tank

Compliance with the applicable requirements of 40 CFR 63 Subpart MM for the No. 5 Smelt Dissolving Tank, including the monitoring, recordkeeping, and reporting requirements of 40 CFR 63 Subpart MM, constitutes compliance with the applicable requirements of 40 CFR 60 Subpart BB for the No. 5 Smelt Dissolving Tank, including operations during periods of startup, shutdown, and malfunction. The requirements of 40 CFR 63 Subpart MM are federally applicable requirements that are more stringent than and overlapping with the 40 CFR 60 Subpart BB requirements. [40 CFR 70.6(f)]

Total suspended particulate <= 0.5 lb/equivalent pulp ton (0.25 kg/equivalent pulp metric ton).

Which Months: All Year Statistical Basis: Twelve-hour average
Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.

Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

EQT0144 L03010 - Tall Oil Reactor

311 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0145 L03011 - #1 Weak Black Liquor Tank

312 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0146 L03012 - #2 Weak Black Liquor Tank

313 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0147 L03013 - #3 Weak Black Liquor Tank

314 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0148 L03014 - #1 Farm Tank

315 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0149 L03015 - #5 Farm Tank

316 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0150 L03016 - #4 White/Black Liquor Tank

317 [LAC 33:III.5109.A] No additional controls is determined as MACT.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EQT0151 L03017 - D/Semi-Chem Weak Black Liquor Storage

318 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0153 L03019 - East-52% Black Liquor Storage Tank

319 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0154 L03020 - West-52% Black Liquor Storage Tank

320 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0155 L03021 - #6 Black Liquor Tank

321 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0156 L03022 - 68%/65% Black Liquor Storage - Tank 1

322 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0157 L03023 - 68%/65% Black Liquor Storage - Tank 2

323 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0160 L03026 - Tall Oil Settling Tank #1

324 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0161 L03027 - Tall Oil Settling Tank #2

325 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0162 L03028 - Tall Oil Storage Tank

326 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0163 L03029 - Brine Storage Tank

327 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0164 L04001 - Slaker and Lime Silo Scrubber

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

EQT0164 L04001 - Slaker and Lime Silo Scrubber

Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation used to measure scrubber flow rate using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]
Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any, of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
Scrubber Liquid Flow rate monitored by technically sound method daily. Permittee shall monitor scrubber liquid flow rate in order to satisfy the requirements of 40 CFR 64 for emissions of particulate matter. This is the only pollutant to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]

Which Months: All Year Statistical Basis: None specified

Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
Scrubber Liquid Flow rate recordkeeping by electronic or hard copy daily. [40 CFR 64.6(c)(4)]
Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum flow rate of the scrubbing liquid necessary to assure compliance with the particulate matter limitations of this permit. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)]
Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-0001-V3

Air - Title V Regular Permit Renewal

EQT0164 L04001 - Slaker and Lime Silo Scrubber

Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the particulate matter emission limitation for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]

Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
Equipment/operational data recordkeeping by electronic or hard copy daily. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
Monitoring data recordkeeping by electronic or hard copy daily. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
No additional controls is determined as MACT.

EQT0165 L04002 - Lime Kiln No. 1

Ensure that this control device reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Subpart S. [40 CFR 63.443(d)(4)(i)]
Total suspended particulate <= 0.064 gr/dscf (0.15 g/dscm) corrected to 10 percent oxygen. Subpart MM. [40 CFR 63.862(a)(1)(i)(C)]
Which Months: All Year Statistical Basis: None specified
Flow rate monitored by flow rate monitoring device once every 15 minutes. Monitor the scrubbing liquid flow rate using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
Which Months: All Year Statistical Basis: None specified
Flow rate recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes. Record the scrubbing liquid flow rate. Subpart MM. [40 CFR 63.864(e)(10)]
Pressure drop monitored by pressure drop instrument once every 15 minutes across the scrubber using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
Which Months: All Year Statistical Basis: None specified
Pressure drop recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes across the scrubber. Subpart MM. [40 CFR 63.864(e)(10)]
Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation used to measure pH, scrubber liquid flow rate, and scrubber supply pressure using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EQT0165 L04002 - Lime Kiln No. 1

351 [40 CFR 64.6(c)(1)]

pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency. Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide and total reduced sulfur. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting both recycle oil and emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting either recycle oil or emissions from PCS002 - LVHC Sources in conjunction with natural gas. Monitoring for total reduced sulfur shall be conducted daily regardless of the fuel combusted. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime. Sulfur dioxide and total reduced sulfur are the only pollutants to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]

Which Months: All Year Statistical Basis: None specified

Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. [40 CFR 64.6(c)(4)]

Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the flow rate of the scrubbing liquid, and the scrubber supply pressure necessary to assure compliance with the sulfur dioxide and total reduced sulfur limitations of this permit. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and total reduced sulfur. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)]

Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]

Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-Y3

Air - Title V Regular Permit Renewal

EQT0165 Lime Kiln No. 1

359 [40 CFR 64.7(e)]

Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide and total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]

Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
Equipment/operational data recordkeeping by electronic or hard copy daily. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

Monitoring data recordkeeping by electronic or hard copy daily. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

Total suspended particulate <= 1.0 lb/equivalent pulp ton (0.5 kg/equivalent pulp metric ton).

Which Months: All Year Statistical Basis: Twelve-hour average

Total reduced sulfur <= 20 ppm.

Which Months: All Year Statistical Basis: Twelve-hour average

Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.

Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

Permittee shall only fire natural gas and recycle oil in this kiln in any combination.

Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

EQT0165 L04002 - Lime Kiln No. 1

- 371 [LAC 33.III.501.C.6] Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.
- 372 [LAC 33.III.509.R.6.c] Conduct a performance/emissions test. Due once prior to any modification to the unit to allow firing of recycle oil in this unit and again after initial firing of recycle oil in this unit. All testing shall be completed no more than 180 days after the initial firing of recycle oil in this unit. The stack tests' purpose is to establish actual emissions both before and after the modification under Prevention of Significant Deterioration, LAC 33.III.509.R.6 and 6.c. The stack test must be conducted at greater than 80% of the permitted maximum capacity. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 6C - Determination of Sulfur Dioxide Emissions from Stationary Sources and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33.III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- 373 [LAC 33.III.5109.A] Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

EQT0166 L04003 - Lime Kiln No. 2

- 374 [40 CFR 63.443(d)(4)(i)] Ensure that this control device reduces total HAP emissions using a boiler, lime kiln, or recovery furnace by introducing the HAP emission stream with the primary fuel or into the flame zone. Subpart S. [40 CFR 63.443(d)(4)(i)]
- 375 [40 CFR 63.862(a)(1)(ii)(C)] Total suspended particulate <= 0.064 gr/dscf (0.15 g/dscm) corrected to 10 percent oxygen. Subpart MM. [40 CFR 63.862(a)(1)(ii)(C)]
- 376 [40 CFR 63.864(e)(10)] Which Months: All Year Statistical Basis: None specified Flow rate monitored by flow rate monitoring device once every 15 minutes. Monitor the scrubbing liquid flow rate using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
- 377 [40 CFR 63.864(c)(10)] Which Months: All Year Statistical Basis: None specified Flow rate recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes. Record the scrubbing liquid flow rate. Subpart MM. [40 CFR 63.864(e)(10)]
- 378 [40 CFR 63.864(e)(10)] Pressure drop monitored by pressure drop instrument once every 15 minutes across the scrubber using the procedures in 40 CFR 63.8(c), as well as the procedures specified in paragraphs 40 CFR 63.864(e)(10)(i) and (ii). Subpart MM. [40 CFR 63.864(e)(10)]
- 379 [40 CFR 63.864(e)(10)] Which Months: All Year Statistical Basis: None specified Pressure drop recordkeeping by continuous parameter monitoring system (CPMS) once every 15 minutes across the scrubber. Subpart MM. [40 CFR 63.864(e)(10)]
- 380 [40 CFR 64.3(b)(3)] Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation used to measure pH, scrubber liquid flow rate, and scrubber supply pressure using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
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EQT0166 L04003 - Lime Kiln No. 2

381 [40 CFR 64.6(c)(1)]

pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency. Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide and total reduced sulfur. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting both recycle oil and emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting either recycle oil or emissions from PCS002 - LVHC Sources in conjunction with natural gas. Monitoring for total reduced sulfur shall be conducted daily when combusting emissions from PCS002 - LVHC Sources. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime. Sulfur dioxide and total reduced sulfur are the only pollutants to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]

Which Months: All Year Statistical Basis: None specified

382 [40 CFR 64.6(c)(2)]

Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. [40 CFR 64.6(c)(4)] Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the flow rate of the scrubbing liquid, and the scrubber supply pressure necessary to assure compliance with the sulfur dioxide and total reduced sulfur limitations of this permit. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and total reduced sulfur. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)]

Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]

383 [40 CFR 64.6(c)(4)]

384 [40 CFR 64.6(d)]

385 [40 CFR 64.7(a)]

386 [40 CFR 64.7(b)]

387 [40 CFR 64.7(c)]

Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)] Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]

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EQT0166 L04003 - Lime Kiln No. 2

389 [40 CFR 64.7(e)]

Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide or total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]

390 [40 CFR 64.9(a)]
Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]

391 [40 CFR 64.9(b)(1)]
Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
Equipment/operational data recordkeeping by electronic or hard copy daily. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]

392 [40 CFR 64.9(b)(1)]
Monitoring data recordkeeping by electronic or hard copy daily. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.

393 [40 CFR 64.9(b)(1)]
Total suspended particulate <= 1.0 lb/equivalent pulp ton (0.5 kg/equivalent pulp metric ton).
Which Months: All Year Statistical Basis: Twelve-hour average
394 [LAC 33:III.1513.C]
Total reduced sulfur <= 20 ppm.
Which Months: All Year Statistical Basis: Twelve-hour average
395 [LAC 33:III.2301.D.1.c]
Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.

396 [LAC 33:III.2301.D.3.d]
Conduct a performance/emissions test: Due within 180 days after initial startup (or restart-up after modification), within 180 days of the issuance of this permit, or within 60 days after achieving normal production rate or end of the shutdown period, whichever is earliest. The stack test's purpose is to demonstrate compliance with the emission limits of this permit. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 7E - Determination of Nitrogen Oxides Emissions from Stationary Sources; Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources; Method 25A - Determination of Total Gaseous Organic Concentration using a Flame Ionization Analyzer; and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

397 [LAC 33:III.2301.D.3.i]
Permittee shall only fire natural gas and recycle oil in this kiln in any combination. In addition, this kiln may combust HAP emission streams in accordance with 40 CFR 63 Subpart S.

398 [LAC 33:III.501.C.6]
Submit notification: Due at least 30 days prior to LDEQ required performance/emissions test to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services, to provide the opportunity to conduct a pretest meeting and observe the emission testing.

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EQT0166 L04003 - Lime Kiln No. 2

- 401 [LAC 33:III.501.C.6] Submit report: Due within 60 days after LDEQ required performance/emissions test. Submit emissions test results to the Office of Environmental Assessment, Environmental Technology Division, Engineering Services.
- 402 [LAC 33:III.509.R.6.c] Conduct a performance/emissions test: Due once prior to any modification to the unit to allow firing of recycle oil in this unit and again after initial firing of recycle oil in this unit. All testing shall be completed no more than 180 days after the initial firing of recycle oil in this unit. The stack test's purpose is to establish actual emissions both before and after the modification under Prevention of Significant Deterioration, LAC 33:III.509.R.6 and 6.c. The stack test must be conducted at greater than 80% of the permitted maximum capacity. Test methods and procedures shall be in accordance with New Source Performance Standards, 40 CFR 60, Appendix A, Method 6C - Determination of Sulfur Dioxide Emissions from Stationary Sources and Method 5 - Determination of Particulate Matter Emissions from Stationary Sources. Use alternate stack test methods only with the prior approval of the Office of Environmental Assessment, Environmental Technology Division, Engineering Services. As required by LAC 33:III.913, provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.

403 [LAC 33:III.509] Total suspended particulate <= 0.067 gr/dscf. Permittee shall determine compliance with this limitation using EPA Reference Method 5. Determined as BACT in Permit No. PSD-LA-37.

Which Months: All Year Statistical Basis: Hourly maximum
Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S and 40 CFR 63 Subpart MM. Determined as MACT.

EQT0167 L04004 - Green Liquor Storage

- 405 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0168 L04005 - Line 1/2 Causticizers

- 406 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0169 L04006 - Line 1/2 White Liquor Filters

- 407 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0170 L04007 - Line 1/2 Precoat Filters

- 408 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0171 L04008 - Line 1/2 Precoat Filter Vacuum Pumps

- 409 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0172 L04009 - Dregs Filter

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EQT0172 L04009 - Dregs Filter

410 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0173 L04010 - Dregs Filter Vacuum Pump

411 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0174 L05001 - Paper Machine No. 1

412 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0175 L05002 - Paper Machine No. 2

413 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0177 L05003 - Paper Machine No. 5

414 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0178 L05004 - Paper Machine No. 6

415 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0180 L05005 - Paper Machine No. 7

416 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0189 L06008 - Coatings & Additives System

417 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0190 L07001 - Wastewater Treatment System

418 [40 CFR 63.446(e)(4)] Total HAP \geq 6.6 lb/ton (3.3 kg/Mg) of ODP removed from the pulping process condensates. Subpart S. [40 CFR 63.446(e)(4)]

Which Months: All Year Statistical Basis: None specified

Condensate Flow rate \geq 0.36 gallons/min per ton of oven dried pulp. [40 CFR 63.453(j)(2)]

Which Months: All Year Statistical Basis: 5 Day average

Oxygen Flow rate \geq 851852 lb/day. Compliance with this limitation shall be measured as oxygen flow to the aeration basin. [40 CFR 63.453(j)(2)]

Which Months: All Year Statistical Basis: 5 Day average

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EQT0190 L07001 - Wastewater Treatment System

- 421 [40 CFR 63.453(j)(2)] Oxygen Flow to the Aeration Basin and Condensate Flow rate monitored by technically sound method daily. Subpart S. [40 CFR 63.453(j)(2)]
Which Months: All Year Statistical Basis: 5 Day average
Conduct performance test: Due within 45 days after the beginning of each quarter. Conduct the test as specified in 40 CFR 63.453(j)(3)(i) and (j)(3)(ii) and 40 CFR 63.457(l). Meet the applicable emission limit in 40 CFR 63.446(e)(2). Subpart S. [40 CFR 63.453(j)(3)]
- 422 [40 CFR 63.453(j)(3)] Use the procedures specified in 40 CFR 63.453(n)(1) through (n)(4) to establish or reestablish the value for each operating parameter required to be monitored under 40 CFR 63.453(b) through (j), (l), and (m) or to establish appropriate parameters for 40 CFR 63.453(f), (i), (j)(2), and (m). Subpart S. [40 CFR 63.453(n)]
- 423 [40 CFR 63.453(n)] Permittee shall shall operate the control device in a manner consistent with the minimum of maximum (as appropriate) operating parameter value or procedure required to be monitored under 40 CFR 63.453(a) - (n) and established under 40 CFR 63 Subpart S. Except as provided in 40 CFR 63.453(p), 40 CFR 63.443(e), or 40 CFR 63.446(g), operation of the control device below minimum operating parameter values or above maximum operating parameter values established under this subpart or failure to perform procedures required by this subpart shall constitute a violation of the applicable emission standard of this subpart and be reported as a period of excess emissions. [40 CFR 63.453(o)]
- 424 [40 CFR 63.453(o)] Comply with the requirements specified in 40 CFR 63.453(p)(1) through (p)(3) whenever a monitoring parameter excursion occurs, and conducting a performance test to demonstrate compliance with the applicable emission limit. Subpart S. [40 CFR 63.453(p)]
- 425 [40 CFR 63.453(p)] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.454(a) through (f), as applicable. Subpart S.
- 426 [40 CFR 63.454] Submit initial notification: Due as soon as practicable, but no later than 15 days, to DEQ before the performance test required in 40 CFR 63.453(p)(2) is scheduled to be conducted. Submit an initial notification of the performance test if the results of the performance test required in 40 CFR 63.453(p)(2) are used to revise the approved values or ranges of the monitoring parameters specified in 40 CFR 63.453(j)(1) or (2). Notify DEQ as soon as practicable, but no later than 24 hours, before the performance test is scheduled to be conducted to confirm the exact date and time of the performance test. Subpart S. [40 CFR 63.455(c)]
- 427 [40 CFR 63.455(e)] Submit notification: Due as soon as practicable to DEQ after the onset of dangerous, hazardous, or otherwise unsafe conditions that did not allow a compliance determination to be conducted using the sampling and test procedures in 40 CFR 63.457(l). Submit notification of the onset of the dangerous, hazardous, or otherwise unsafe conditions no later than 24 hours after the onset and include the specific reason(s) that the sampling and test procedures in 40 CFR 63.457(l) could not be performed. Subpart S. [40 CFR 63.455(f)]
- 428 [40 CFR 63.455(f)] Determine compliance with the provisions of 40 CFR 63 Subpart S by using the test methods and procedures specified in 40 CFR 63.457(a) through (n), as applicable. Subpart S.
- 429 [40 CFR 63.457] Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S. Determined as MACT.

EQT0195 L09003 - Gasoline Storage Tank - Storeroom

- 431 [LAC 33:III.2103.A] Equip with a submerged fill pipe.
432 [LAC 33:III.2103.I] Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in LAC 33:III.2103.I.1 - 7, as applicable.

EQT0196 L09004 - Wet-Strength Resin Tank

SPECIFIC REQUIREMENTS

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EQT0196 L09004 - Wet-Strength Resin Tank

433 [40 CFR 60.116(b)]

Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel. Keep copies of all records for the life of the source as specified by 40 CFR 60.116(b)(a). Subpart Kb. [40 CFR 60.116(b)]. [40 CFR 60.116(b)]

EQT0198 L03030 - Barometric Condenser Supply Tank

434 [LAC 33.III.5109.A]

No additional controls is determined as MACT.

EQT0199 L03031 - Evap Weak Black Liquor Reclaim Tank SE

435 [LAC 33.III.5109.A]

No additional controls is determined as MACT.

EQT0200 L09006 - No. 3 and No. 5 Hotwells

436 [40 CFR 63.446(d)(2)(i)]

Condensate tank: Ensure that the fixed roof and all openings (e.g., access hatches, sampling ports, gauge wells) are designed and operated with no detectable leaks as indicated by an instrument reading of less than 500 parts per million above background, and vented into a closed-vent system that meets the requirements in 40 CFR 63.450 and routed to a control device that meets the requirements in 40 CFR 63.443(d). Subpart S. [40 CFR 63.446(d)(2)(i)]

Condensate tank: Maintain each opening in a closed, sealed position (e.g., covered by a lid that is gasketed and latched) at all times that the tank contains pulping process condensates or any HAP removed from a pulping process condensate stream except when it is necessary to use the opening for sampling, removal, or for equipment inspection, maintenance, or repair. Subpart S. [40 CFR 63.446(d)(2)(ii)]

Condensate tank: Presence of a leak monitored by 40 CFR 60, Appendix A, Method 21 once initially and annually. Operate with no detectable leaks as specified in 40 CFR 63.446(d)(2)(i) measured by the procedures specified in 40 CFR 63.457(d). Subpart S. [40 CFR 63.453(l)(2)]

Which Months: All Year Statistical Basis: None specified

Equipment/operational data recordkeeping by electronic or hard copy at the regulation's specified frequency. Keep records of the information specified in 40 CFR 63.454(a) through (f), as applicable. Subpart S.

Determine compliance with the provisions of 40 CFR 63 Subpart S by using the test methods and procedures specified in 40 CFR 63.457(a) through (n), as applicable. Subpart S.

EQT0201 L09008 - Temporary Compressors

441 [LAC 33.III.501.C.6]

Permittee shall not operate any compressor that meets the following criteria:

- (a) The compressor has a site rating of greater than 500 bhp and was constructed or reconstructed on or after December 19, 2002.
- (b) The compressor has a site rating of less than or equal 500 bhp and was constructed or reconstructed on or after June 12, 2006.

The purpose of this condition is to maintain exemption from the provisions of 40 CFR 63 Subpart ZZZZ.

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EQT0201 L09008 - Temporary Compressors

442 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March. Report the total combined operating rate for all temporary compressors for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

443 [LAC 33:III.501.C.6] Total combined operating rate <= 926,184.00 hp-hrs/yr. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the total combined operating rate for all temporary compressors exceeds the maximum listed in this specific condition for any twelve consecutive month period.

444 [LAC 33:III.501.C.6] Total combined operating rate monitored by technically sound method continuously.

445 [LAC 33:III.501.C.6] Total combined operating rate recordkeeping by electronic or hard copy monthly. Keep records of the total combined operating rate for all temporary compressors each month, as well as the total combined operating rate for all temporary compressors for the last twelve months. Make records available for inspection by DEQ personnel.

EQT0204 L09011 - Mill Water Treatment Clarifier

446 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0206 L03024 - No. 4 Salt Cake Mix Tank

447 [LAC 33:III.5109.A] No additional controls is determined as MACT.

EQT0207 L03025 - No. 5 Salt Cake Mix Tank

448 [LAC 33:III.5109.A] No additional controls is determined as MACT.

FUG0005 L09001 - OCC Plant Fugitives

449 [LAC 33:III.5109.A] No additional controls is determined as MACT.

FUG0006 L09002 - Secondary Fiber Plant Fugitives

450 [LAC 33:III.5109.A] No additional controls is determined as MACT.

GRP005 No. 4 Recovery Combined Stack Cap

Group Members: EQT0138 EQT0139

451 [LAC 33:III.2301.D.1.a] Total suspended particulate <= 4.0 lb/equivalent pulp ton (2.0 kg/equivalent pulp metric ton).
Which Months: All Year Statistical Basis: Twelve-hour average
Submit test results: Due to the Office of Environmental Assessment as specified in LAC 33:III.919 and 918. Submit the results of the source test.

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GRP0005 No. 4 Recovery Combined Stack Cap

- Total suspended particulate monitored by the regulation's specified method(s) at the regulation's specified frequency. Conduct source tests pursuant to the provisions in LAC 33:III.1503.D.2, Table 4, to confirm particulate emissions are less than that specified in LAC 33:III.2301.D.1. Conduct four tests at six month intervals within 24 months of promulgation of LAC 33:III.2301, and one test annually thereafter.
- Which Months: All Year Statistical Basis: Twelve-hour average
Opacity <= 40 percent, except for one 6-minute period in any 60 consecutive minutes.
- Which Months: All Year Statistical Basis: Six-minute average
Black Liquor Solids Throughput monitored by technically sound method continuously.
- Which Months: All Year Statistical Basis: None specified
Black Liquor Solids Throughput recordkeeping by electronic or hard copy monthly. Keep records of the total black liquor solids throughput through this boiler each month, as well as the total black liquor solids throughput through this boiler for the last twelve months. Make records available for inspection by DEQ personnel.
- Natural Gas Annual capacity factor < 10 percent. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the annual capacity factor for natural gas combusted in this boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.
- Which Months: All Year Statistical Basis: Annual average
Natural Gas Annual capacity factor monitored by technically sound method monthly.
- Which Months: All Year Statistical Basis: None specified
Natural Gas Annual capacity factor recordkeeping by electronic or hard copy monthly. Keep records of the total annual capacity factor for natural gas combusted in this boiler each month, as well as the total annual capacity factor for natural gas combusted in this boiler for the last twelve months. Make records available for inspection by DEQ personnel.
- Submit report: Due annually, by the 31st of March. Report the annual capacity factor for natural gas combusted in this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- Submit report: Due annually, by the 31st of March. Report the total black liquor solids throughput through this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- Throughput < 502000 tons/yr of black liquor solids. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the total black liquor solids throughput through this boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.
- Which Months: All Year Statistical Basis: None specified
- GRP0006 No. 5 Recovery Combined Stack Cap**
- Group Members: EQ10141 EQ10142
- 463 [40 CFR 60.282(a)(1)(i)] Total suspended particulate <= 0.044 gr/dscf(0.10 g/dscm) corrected to 8 percent oxygen. Subpart BB. [40 CFR 60.282(a)(1)(i)]
Which Months: All Year Statistical Basis: None specified
Opacity <= 35 percent. Subpart BB. [40 CFR 60.282(a)(1)(ii)]
- 464 [40 CFR 60.282(a)(1)(ii)] Which Months: All Year Statistical Basis: None specified
Total reduced sulfur <= 5 ppmv (dry basis) corrected to 8 percent oxygen. Subpart BB. [40 CFR 60.283(a)(2)]
- 465 [40 CFR 60.283(a)(2)] Which Months: All Year Statistical Basis: None specified

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GRP0006 No. 5 Recovery Combined Stack Cap

- Opacity monitored by continuous opacity monitor (COM) continuously. Set the span of this system at 70 percent opacity. Subpart BB. [40 CFR 60.284(a)(1)]
- Which Months: All Year Statistical Basis: None specified
- Opacity recordkeeping by electronic or hard copy continuously. Subpart BB. [40 CFR 60.284(a)(1)]
- Oxygen monitored by continuous emission monitor (CEM) continuously. Monitor the percent of oxygen by volume on a dry basis, except where the provisions of 40 CFR 60.283(a)(1)(iii) or (a)(1)(iv) apply. Locate the continuous monitoring system downstream of the control device(s). Set the span at 25 percent oxygen. Subpart BB. [40 CFR 60.284(a)(2)]
- Which Months: All Year Statistical Basis: None specified
- Oxygen recordkeeping by electronic or hard copy continuously. Record the percent of oxygen by volume on a dry basis. Subpart BB. [40 CFR 60.284(a)(2)]
- Total reduced sulfur monitored by continuous emission monitor (CEM) continuously. Monitor the concentration of TRS emissions on a dry basis, except where the provisions of 40 CFR 60.283(a)(1)(iii) or (a)(1)(iv) apply. Locate the continuous monitoring system downstream of the control device(s). Set the span at a TRS concentration of 30 ppm. Subpart BB. [40 CFR 60.284(a)(2)]
- Which Months: All Year Statistical Basis: None specified
- Total reduced sulfur recordkeeping by electronic or hard copy continuously. Record the concentration of TRS emissions on a dry basis. Subpart BB. [40 CFR 60.284(a)(2)]
- Calculate on a daily basis the 12-hour average TRS concentrations for the two consecutive periods of each operating day, except where the provisions of 40 CFR 60.283(a)(1)(iii) or (a)(1)(iv) apply. Determine each 12-hour average as the arithmetic mean of the appropriate 12 contiguous 1-hour average total reduced sulfur concentrations provided by each continuous monitoring system installed under 40 CFR 60.284(a)(2). Subpart BB. [40 CFR 60.284(c)(1)]
- Total reduced sulfur recordkeeping by electronic or hard copy daily. Record the 12-hour average TRS concentrations for the two consecutive periods of each operating day. Subpart BB. [40 CFR 60.284(c)(1)]
- Calculate and record on a daily basis 12-hour average oxygen concentrations for the two consecutive periods of each operating day, except where the provisions of 40 CFR 60.283(a)(1)(iii) or (a)(1)(iv) apply. Ensure that these 12-hour averages correspond to the 12-hour average TRS concentrations under 40 CFR 60.284(c)(1). Determine the 12-hour averages as an arithmetic mean of the appropriate 12 contiguous 1-hour average oxygen concentrations provided by each continuous monitoring system installed under 40 CFR 60.284(a)(2). Subpart BB. [40 CFR 60.284(c)(2)]
- Oxygen recordkeeping by electronic or hard copy daily. Record the 12-hour average oxygen concentrations for the two consecutive periods of each operating day. Subpart BB. [40 CFR 60.284(c)(2)]
- Submit Report: Due semiannually. Submit reports of any periods of excess emissions as defined in 40 CFR 60.284(d), for the purpose of reports required under 40 CFR 60.7(c). Subpart BB. [40 CFR 60.284(d)]
- Follow the procedures under 40 CFR 60.13 for installation, evaluation, and operation of the continuous monitoring systems required under 40 CFR 60.284. Subpart BB. [40 CFR 60.284(f)]
- Use as reference methods and procedures the test methods in appendix A of 40 CFR 60 or other methods and procedures in 40 CFR 60.285, except as provided in 40 CFR 60.8(b), in conducting the performance tests required in 40 CFR 60.8. Subpart BB. [40 CFR 60.285(a)]
- Determine compliance with the particulate matter standards in 40 CFR 60.282(a)(1) and (3) using the methods and procedures specified in 40 CFR 60.285(b)(1)to (b)(3). Subpart BB. [40 CFR 60.285(b)]

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Air - Title V Regular Permit Renewal

GRP0006 No. 5 Recovery Combined Stack Cap

- 480 [40 CFR 60.285(d)] Determine compliance with the TRS standards in 40 CFR 60.283, except 40 CFR 60.283(a)(1)(vi) and (4), using the methods and procedures specified in 40 CFR 60.285(d)(1) to (d)(3). Subpart BB. [40 CFR 60.285(d)]
Compliance with the applicable requirements of 40 CFR 63 Subpart MM for the No. 5 Recovery Boiler, including the monitoring, recordkeeping, and reporting requirements of 40 CFR 63 Subpart MM, constitutes compliance with the applicable requirements of 40 CFR 60 Subpart BB for the No. 5 Recovery Boiler, including operations during periods of startup, shutdown, and malfunction. The requirements of 40 CFR 63 Subpart MM are federally applicable requirements that are more stringent than and overlapping with the 40 CFR 60 Subpart BB requirements. [40 CFR 70.6(f)]

Total suspended particulate <= 4.0 lb/equivalent pulp ton (2.0 kg/equivalent pulp metric ton).

Which Months: All Year Statistical Basis: Twelve-hour average

Submit test results: Due to the Office of Environmental Assessment as specified in LAC 33:III.919 and 918. Submit the results of the source test.

- Total suspended particulate monitored by the regulation's specified method(s) at the regulation's specified frequency. Conduct source tests pursuant to the provisions in LAC 33:III.1503.D.2, Table 4, to confirm particulate emissions are less than that specified in LAC 33:III.2301.D.1. Conduct four tests at six month intervals within 24 months of promulgation of LAC 33:III.2301, and one test annually thereafter.
Which Months: All Year Statistical Basis: Twelve-hour average
Natural Gas Annual capacity factor < 10 percent. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the annual capacity factor for natural gas combusted in this boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.
Which Months: All Year Statistical Basis: Annual average
Natural Gas Annual capacity factor monitored by technically sound method monthly.

Which Months: All Year Statistical Basis: None specified

- Natural Gas Annual capacity factor recordkeeping by electronic or hard copy monthly. Keep records of the total annual capacity factor for natural gas combusted in this boiler each month, as well as the total annual capacity factor for natural gas combusted in this boiler for the last twelve months. Make records available for inspection by DEQ personnel.
Submit report: Due annually, by the 31st of March. Report the annual capacity factor for natural gas combusted in this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.

SCN0001 No. 1 Foster Wheeler Startup-Shutdown

Group Members: EQT0135

- 489 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
Permittee shall not fire high volume, low concentration (HVLC) gases that are routed from PCS 1 - HVLC Sources in this unit during periods of startup or shutdown.
No additional controls is determined as MACT.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN002 No. 2 Foster Wheeler Startup-Shutdown

Group Members: EQT0136

492 [LAC 33:III.1513.C]

Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions. Permittee shall not fire high volume, low concentration (HVLC) gases that are routed from PCS 1 - HVLC Sources in this unit during periods of startup or shutdown.

No additional controls is determined as MACT.

SCN003 No. 1 Lime Kiln Startup-Shutdown

Group Members: EQT0165

495 [40 CFR 64.3(b)(3)]

496 [40 CFR 64.6(c)(1)]

Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation used to measure pH, scrubber liquid flow rate, and scrubber supply pressure using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]
Permittee shall monitor pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency. Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide and total reduced sulfur. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting both recycle oil and emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting either recycle oil or emissions from PCS002 - LVHC Sources in conjunction with natural gas. Monitoring for total reduced sulfur shall be conducted daily regardless of the fuel combusted. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime. Sulfur dioxide and total reduced sulfur are the only pollutants to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]

Which Month: All Year Statistical Basis: None specified
Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. [40 CFR 64.6(c)(4)]
Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the flow rate of the scrubbing liquid, and the scrubber supply pressure necessary to assure compliance with the sulfur dioxide and total reduced sulfur limitations of this permit. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and total reduced sulfur. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)]

Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

SCN0003 No. 1 Lime Kiln Startup-Shutdown

- 502 [40 CFR 64.7(c)] Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 503 [40 CFR 64.7(d)(1)] Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 504 [40 CFR 64.7(e)] Submit written notification. Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide and total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 505 [40 CFR 64.9(a)] Submit report. Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 506 [40 CFR 64.9(b)(1)] Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 507 [40 CFR 64.9(b)(1)] Equipment/operational data recordkeeping by electronic or hard copy daily. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 508 [40 CFR 64.9(b)(1)] Monitoring data recordkeeping by electronic or hard copy daily. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 509 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 510 [LAC 33:III.2301.D.1.c] Total suspended particulate <= 1.0 lb/Equivalent pulp ton (0.5 kg/equivalent pulp metric ton).
- 511 [LAC 33:III.2301.D.3.d] Which Months: All Year Statistical Basis: Twelve-hour average
Total reduced sulfur <= 20 ppm.
- 512 [LAC 33:III.2301.D.3.i] Which Months: All Year Statistical Basis: Twelve-hour average
Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.
- 513 [LAC 33:III.5109.A] Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S and 40 CFR 63 Subpart MM. Determined as MACT.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

SCN0004 No. 2 Lime Kiln Startup-Shutdown

Group Members: EQT0166

- 514 [40 CFR 64.3(b)(3)]
515 [40 CFR 64.6(c)(1)]
516 [40 CFR 64.6(c)(2)]
517 [40 CFR 64.6(c)(4)]
518 [40 CFR 64.6(d)]
519 [40 CFR 64.7(a)]
520 [40 CFR 64.7(b)]
521 [40 CFR 64.7(c)]
- Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation used to measure pH, scrubber liquid flow rate, and scrubber supply pressure using procedures that take into account manufacturer's specifications. [40 CFR 64.3(b)(3)]
pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency.
Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide and total reduced sulfur. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting both recycle oil and emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting either recycle oil or emissions from PCS002 - LVHC Sources in conjunction with natural gas. Monitoring for total reduced sulfur shall be conducted daily when combusting emissions from PCS002 - LVHC Sources. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime. Sulfur dioxide and total reduced sulfur are the only pollutants to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]
- Which Month: All Year Statistical Basis: None specified
Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)]
Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. [40 CFR 64.6(c)(4)]
Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the flow rate of the scrubbing liquid, and the scrubber supply pressure necessary to assure compliance with the sulfur dioxide and total reduced sulfur limitations of this permit. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and total reduced sulfur. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)]
Conduct the monitoring required under 40 CFR 64 upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
Air - Title V Regular Permit Renewal

SCN0004 No. 2 Lime Kiln Startup-Shutdown

- 522 [40 CFR 64.7(d)(1)] Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 523 [40 CFR 64.7(e)] Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide or total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 524 [40 CFR 64.9(a)] Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(iii), as applicable. [40 CFR 64.9(a)]
- 525 [40 CFR 64.9(b)(1)] Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 526 [40 CFR 64.9(b)(1)] Equipment/operational data recordkeeping by electronic or hard copy daily. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64.8 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 527 [40 CFR 64.9(b)(1)] Monitoring data recordkeeping by electronic or hard copy daily. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 528 [LAC 33:III.1513.C] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 529 [LAC 33:III.2301.D.1.c] Total suspended particulate <= 1.0 lb/equivalent pulp ton (0.5 kg/equivalent pulp metric ton).
- 530 [LAC 33:III.2301.D.3.d] Which Months: All Year Statistical Basis: Twelve-hour average
Total reduced sulfur <= 20 ppm.
- 531 [LAC 33:III.2301.D.3.i] Which Months: All Year Statistical Basis: Twelve-hour average
Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.
- 532 [LAC 33:III.509] Total suspended particulate <= 0.067 gr/dscf. Permittee shall determine compliance with this limitation using EPA Reference Method 5.
Determined as BACT in Permit No. PSD-LA-37.
- 533 [LAC 33:III.5109.A] Which Months: All Year Statistical Basis: Hourly maximum
Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart S and 40 CFR 63 Subpart MM. Determined as MACT.

SCN0005 Bark Boiler Startup-Shutdown

Group Members: EQT0137

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN0005 Bark Boiler Startup-Shutdown

- 534 [40 CFR 64.3(b)(3)] Specific QA/QC Procedures: Calibrate, operate, and maintain instrumentation used to measure pH, scrubber liquid flow rate, scrubber supply pressure, and differential pressure across the scrubber using procedures that take into account manufacturer's specifications. [40 CFR 64.3 (b)(3)] Comply with the submitted implementation plan and schedule for installing, testing and performing any other appropriate activities prior to use of the monitoring, if any, of the approved monitoring in this permit requires installation, testing, or other necessary activities prior to use of the monitoring for purposes of 40 CFR 64. Implement monitoring as expeditiously as practicable after approval of the monitoring pursuant to 40 CFR 64.6, but in no case shall the period for completing installation and beginning operation of the monitoring exceed 180 days after approval of the permit. [40 CFR 64.4(e)]
- 535 [40 CFR 64.4(e)] Either differential pressure across the scrubber or pH and either Scrubber Supply Pressure or Scrubber Liquid Flow rate monitored by technically sound method at the approved frequency. Permittee shall monitor differential pressure across the scrubber and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of particulate matter. Permittee shall monitor pH and either scrubber flow or scrubber supply pressure in order to satisfy the requirements of 40 CFR 64 for emissions of sulfur dioxide. Monitoring for particulate matter shall be conducted four (4) times per hour when combusting wood. Monitoring for sulfur dioxide shall be conducted four (4) times per hour when combusting emissions from PCS002 - LVHC Sources. Monitoring for sulfur dioxide shall be conducted daily when combusting emissions from PCS001 - HVLC Sources. When combusting combinations of fuels, the permittee shall conduct monitoring in accordance with the most stringent applicable monitoring regime. Particulate matter and sulfur dioxide are the only pollutants to which CAM applies for this emissions unit. [40 CFR 64.6(c)(1)]
- 536 [40 CFR 64.6(c)(1)] Which Month(s): All Year Statistical Basis: None specified Submit Notification: Due to DEQ within five (5) working days of the establishment or reestablishment of any exceedance or excursion level, for purposes of responding to and reporting exceedances or excursions under 40 CFR 64.7 and 64.8. [40 CFR 64.6(c)(2)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. [40 CFR 64.6(c)(4)] Schedule for installation, testing or final verification of operational status: Permittee shall conduct a performance test no later than 180 days after the issuance of Permit No. 2160-00001-V3. This performance test shall determine the minimum pH of the scrubbing liquid, the minimum differential pressure across the scrubber, the minimum scrubber supply pressure, and the minimum scrubber liquid flow rate necessary to assure compliance with the sulfur dioxide and particulate matter limitations. Permittee shall conduct this test while firing the worst case fuel(s) for emissions of sulfur dioxide and particulate matter. Within 45 days of obtaining the relevant test results, the permittee shall submit an administrative amendment to incorporate the operating parameters determined in the performance test. [40 CFR 64.6(d)] Conduct the monitoring required under 40 CFR 64.6(d) upon issuance of a part 70 or 71 permit that includes such monitoring, or by such later date specified in the permit pursuant to 40 CFR 64.6(d). [40 CFR 64.7(a)]
- 537 [40 CFR 64.6(c)(2)] Maintain the monitoring required under 40 CFR 64 at all times, including but not limited to maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 64.7(b)]
- 538 [40 CFR 64.6(c)(4)] Conduct all monitoring required under 40 CFR 64 in continuous operation (or collect data at all required intervals) at all times that the pollutant-specific emissions unit is operating, except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments). Do not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities for purposes of 40 CFR 64, including data averages and calculations, or for fulfilling a minimum data availability requirement, if applicable. Use all the data collected during all other periods in assessing the operation of the control device and associated control system. [40 CFR 64.7(c)]
- 539 [40 CFR 64.6(d)]
- 540 [40 CFR 64.7(a)]
- 541 [40 CFR 64.7(b)]
- 542 [40 CFR 64.7(c)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN0005 Bark Boiler Startup-Shutdown

- 543 [40 CFR 64.7(d)(1)] Restore operation of the pollutant-specific emissions unit (including the control device and associated capture system) to its normal or usual manner of operation as expeditiously as practicable upon detecting an excursion or exceedance, in accordance with good air pollution control practices for minimizing emissions. Minimize the period of any startup, shutdown or malfunction, and take any necessary corrective actions to restore normal operation and prevent the likely recurrence of the cause of an excursion or exceedance (other than those caused by excused startup or shutdown conditions). [40 CFR 64.7(d)(1)]
- 544 [40 CFR 64.7(e)] Submit written notification: Due to the Office of Environmental Compliance within 72 hours upon identifying a failure to achieve compliance with the sulfur dioxide and total reduced sulfur emission limitations for which, after approval of monitoring under 40 CFR 64, the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions. If necessary, submit a proposed modification to the part 70 or 71 permit to address the necessary monitoring changes. [40 CFR 64.7(e)]
- 545 [40 CFR 64.9(a)] Submit report: Due on and after the date specified in 40 CFR 64.7(a) by which the owner or operator must use monitoring that meets the requirements of 40 CFR 64. Submit monitoring reports to the DEQ in accordance with 40 CFR 70.6(a)(3)(iii). Include in a report for monitoring under 40 CFR 64, at a minimum, the information required under 40 CFR 70.6(a)(3)(iii) and the information specified in 40 CFR 64.9(a)(2)(i) through (a)(2)(i), as applicable. [40 CFR 64.9(a)] Comply with the recordkeeping requirements specified in 40 CFR 70.6(a)(3)(ii). [40 CFR 64.9(b)(1)]
- 546 [40 CFR 64.9(b)(1)] Equipment/operational data recordkeeping by electronic or hard copy at the approved frequency. Maintain records of monitor performance data, corrective actions taken, any written quality improvement plan required pursuant to 40 CFR 64.8 and any activities undertaken to implement a quality improvement plan, and other supporting information required to be maintained under 40 CFR 64 (such as data used to document the adequacy of monitoring, or records of monitoring maintenance or corrective actions). Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)]
- 547 [40 CFR 64.9(b)(1)] Monitoring data recordkeeping by electronic or hard copy at the approved frequency. Maintain these records for a period of at least five years. [40 CFR 64.9(b)(1)] Total suspended particulate <= 0.6 lb/MMBTU of heat input.
Which Months: All Year Statistical Basis: None specified
Sulfur dioxide <= 2000 ppmv at standard conditions.
- 548 [40 CFR 64.9(b)(1)] Which Months: All Year Statistical Basis: Three-hour average
- 549 [LAC 33:III.1313.C] Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
- 550 [LAC 33:III.1503.C]
- 551 [LAC 33:III.1503.D.1]
- 552 [LAC 33:III.1511.C.3]
- 553 [LAC 33:III.1513.A.2]
- 554 [LAC 33:III.1513.A.2]
- Submit compliance determination results: Due no later than 90 days after completion of test.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN0005 Bark Boiler Startup-Shutdown

- 555 [LAC 33:III.1513.B.3] Equipment/operational data recordkeeping by electronic or hard copy once initially and annually. Record and retain at the site sufficient data to show annual potential sulfur dioxide emissions.
- 556 [LAC 33:III.1513.B.3] Fuel rate recordkeeping by electronic or hard copy monthly. Record the actual sulfur dioxide emissions.
- 557 [LAC 33:III.1513.E] Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
- 558 [LAC 33:III.1513.E] Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 559 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- 560 [LAC 33:III.2301.D.1.d] Comply with LAC 33:III.1313.
- 561 [LAC 33:III.2301.D.2] Do not exceed the limits set forth in LAC 33:III.1503.C.
- 562 [LAC 33:III.2301.D.3.h] Two (2) percent of all 12-hour averages per quarter year above the specified level, under conditions of proper operation and maintenance, exclusive of start-ups, shut downs and malfunctions are not considered to be violations of the emission limitation.
- 563 [LAC 33:III.509] Particulate matter (10 microns or less) $\leq 0.10 \text{ lb/MMBTU}$. Permittee shall determine compliance with this limitation using EPA reference Method 5. Determined as BACT in Permit No. PSD-LA-37.
- 564 [LAC 33:III.509] Which Month: All Year Statistical Basis: Hourly maximum Sulfur dioxide $\leq 0.73 \text{ lb/MMBTU}$. Permittee shall determine compliance with this limitation using EPA Reference Method 6. Determined as BACT in Permit No. PSD-LA-37.
- 565 [LAC 33:III.5109.A] Which Month: All Year Statistical Basis: Hourly maximum No additional controls is determined as MACT.

SCN0006 No. 4 Recovery Combined Stack Startup-Shutdown

Group Members: EQT0138 EQT0139

- 566 [LAC 33:III.1503.C] Sulfur dioxide $\leq 2000 \text{ ppmv}$ at standard conditions.
- 567 [LAC 33:III.1503.D.1] Which Month: All Year Statistical Basis: Three-hour average Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
- 568 [LAC 33:III.1511.C.3] Permittee shall demonstrate compliance with the sulfur dioxide limitations of LAC 33:III.Chapter 15 by conducting a performance test in accordance with the approved test methods set forth in LAC 33:III.Chapter 15, Table 4 once every five (5) years.
- 569 [LAC 33:III.1513.A.2] Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
- 570 [LAC 33:III.1513.A.2] Submit compliance determination results: Due no later than 90 days after completion of test.
- 571 [LAC 33:III.1513.B.3] Permittee shall record the results of each performance test conducted in order to show compliance with the requirements of LAC 33:III.Chapter 15.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN0006 No. 4 Recovery Combined Stack Startup-Shutdown

- 572 [LAC 33:III.1513.E] Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
- 573 [LAC 33:III.1513.E]
- 574 [LAC 33:III.1513.E] Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
- 575 [LAC 33:III.2301.D.1.a] Total suspended particulate <= 4.0 lb/equivalent pulp ton (2.0 kg/equivalent pulp metric ton).
Which Months: All Year Statistical Basis: Twelve-hour average
Do not exceed the limits set forth in LAC 33:III.1503.C.
- 576 [LAC 33:III.2301.D.2]
- 577 [LAC 33:III.2301.D.4.a] Submit test results: Due to the Office of Environmental Assessment as specified in LAC 33:III.919 and 918. Submit the results of the source test.
- 578 [LAC 33:III.2301.D.4.a] Total suspended particulate monitored by the regulation's specified method(s) at the regulation's specified frequency. Conduct source tests pursuant to the provisions in LAC 33:III.1503.D.2, Table 4, to confirm particulate emissions are less than that specified in LAC 33:III.2301.D.1.
Conduct four tests at six month intervals within 24 months of promulgation of LAC 33:III.2301, and one test annually thereafter.
- 579 [LAC 33:III.2301.D.4] Which Months: All Year Statistical Basis: Twelve-hour average
Opacity <= 40 percent, except for one 6-minute period in any 60 consecutive minutes.
Which Months: All Year Statistical Basis: Six-minute average
- 580 [LAC 33:III.501.C.6] Natural Gas Annual capacity factor < 10 percent. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the annual capacity factor for natural gas combusted in this boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.
- 581 [LAC 33:III.501.C.6] Which Months: All Year Statistical Basis: Annual average
Natural Gas Annual capacity factor monitored by technically sound method monthly.
Which Months: All Year Statistical Basis: None specified
- 582 [LAC 33:III.501.C.6] Natural Gas Annual capacity factor recordkeeping by electronic or hard copy monthly. Keep records of the total annual capacity factor for natural gas combusted in this boiler each month, as well as the total annual capacity factor for natural gas combusted in this boiler for the last twelve months. Make records available for inspection by DEQ personnel.
- 583 [LAC 33:III.501.C.6] Submit report: Due annually, by the 31st of March. Report the annual capacity factor for natural gas combusted in this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- 584 [LAC 33:III.5109.A] Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

SCN0007 No. 4 Recovery Boiler Smelt Dissolving Tank Startup-Shutdown

Group Members: EQT0140

- 585 [LAC 33:III.2301.D.1.b] Total suspended particulate <= 0.5 lb/equivalent pulp ton (0.25 kg/equivalent pulp metric ton).
Which Months: All Year Statistical Basis: Twelve-hour average

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN0007 No. 4 Recovery Boiler Smelt Dissolving Tank Startup-Shutdown

586 [LAC 33:III.2301.D.3.f] Total reduced sulfur <= 0.016 g/kg of black liquor solids fired. Alternatively, compliance with the particulate emission limits of LAC 33:III.2301.D.1.b by a scrubbing device employing fresh water as the scrubbing medium make up will be accepted as evidence of adequate TRS control.

Which Months: All Year Statistical Basis: Twelve-hour average
Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.
Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determine as MACT.

SCN0008 No. 5 Recovery Combined Stack Startup-Shutdown

Group Members: GRP0006

- 589 [LAC 33:III.1503.C] Sulfur dioxide <= 2000 ppmv at standard conditions.
Which Months: All Year Statistical Basis: Three-hour average
Determine compliance with the appropriate emission limitation in LAC 33:III.1503.A through 1503.C using the methods listed in LAC 33:III.1503.D. Table 4 or any such equivalent method as may be approved by DEQ. Use these methods for initial compliance determinations and for any additional compliance determinations as requested by DEQ.
Permittee shall demonstrate compliance with the sulfur dioxide limitations of LAC 33:III.Chapter 15 by conducting a performance test in accordance with the approved test methods set forth in LAC 33:III.Chapter 15, Table 4 once every five (5) years.
Equipment/operational data recordkeeping by electronic or hard copy upon each occurrence. Record the initial and additional compliance determination data.
Submit compliance determination results: Due no later than 90 days after completion of test.
Permittee shall record the results of each performance test conducted in order to show compliance with the requirements of LAC 33:III.Chapter 15.
590 [LAC 33:III.1503.D.1] Make all compliance data available to a representative of DEQ or the U.S. EPA on request.
Submit excess emissions report: Due quarterly in accordance with LAC 33:I.Chapter 39. Submit reports of three-hour excess emissions and reports of emergency conditions.
Submit report: Due annually, by the 31st of March, in accordance with LAC 33:III.918. Report data required to demonstrate compliance with the provisions of LAC 33:III.Chapter 15.
Total suspended particulate <= 4.0 lb/equivalent pulp ton (2.0 kg/equivalent pulp metric ton).
Which Months: All Year Statistical Basis: Twelve-hour average
Do not exceed the limits set forth in LAC 33:III.1503.C.
Submit test results: Due to the Office of Environmental Assessment as specified in LAC 33:III.919 and 918. Submit the results of the source test.
- 591 [LAC 33:III.1513.C.3]
592 [LAC 33:III.1513.A.2]
593 [LAC 33:III.1513.A.2]
594 [LAC 33:III.1513.B.3]
595 [LAC 33:III.1513.E]
596 [LAC 33:III.1513.E]
597 [LAC 33:III.1513.E]
598 [LAC 33:III.2301.D.1.a]
599 [LAC 33:III.2301.D.2]
600 [LAC 33:III.2301.D.4.a]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31

Activity Number: PER20050001

Permit Number: 2160-00001-V3

Air - Title V Regular Permit Renewal

SCN0008 No. 5 Recovery Combined Stack Startup-Shutdown

- 601 [LAC 33:III.2301.D.4.a] Total suspended particulate monitored by the regulation's specified method(s) at the regulation's specified frequency. Conduct source tests pursuant to the provisions in LAC 33:III.1503.D.2, Table 4, to confirm particulate emissions are less than that specified in LAC 33:III.2301.D.1. Conduct four tests at six month intervals within 24 months of promulgation of LAC 33:III.2301, and one test annually thereafter.
- Which Months: All Year Statistical Basis: Twelve-hour average
- Natural Gas Annual capacity factor < 10 percent. Noncompliance with this limitation is a reportable violation of the permit. Notify the Office of Environmental Compliance, Enforcement Division if the annual capacity factor for natural gas combusted in this boiler exceeds the maximum listed in this specific condition for any twelve consecutive month period.
- Which Months: All Year Statistical Basis: Annual average
- Natural Gas Annual capacity factor monitored by technically sound method monthly.
- Which Months: All Year Statistical Basis: None specified
- Natural Gas Annual capacity factor recordkeeping by electronic or hard copy monthly. Keep records of the total annual capacity factor for natural gas combusted in this boiler each month, as well as the total annual capacity factor for natural gas combusted in this boiler for the last twelve months. Make records available for inspection by DEQ personnel.
- Submit report: Due annually, by the 31st of March. Report the annual capacity factor for natural gas combusted in this boiler for the preceding calendar year to the Office of Environmental Compliance, Enforcement Division.
- Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

SCN0009 No. 5 Recovery Boiler Smelt Dissolving Tank Startup-Shutdown

Group Members: EQT0143

- 607 [LAC 33:III.2301.D.1.b] Total suspended particulate <= 0.5 lb/equivalent pulp ton (0.25 kg/equivalent pulp metric ton).
- Which Months: All Year Statistical Basis: Twelve-hour average
- Achieve final compliance with the provisions of LAC 33:III.2301.D.3 as expeditiously as practicable but not more than six years from the effective date of LAC 33:III.2301.
- Permittee shall comply with all applicable requirements of 40 CFR 63 Subpart MM. Determined as MACT.

UNF0001 West Monroe Mill # 31

- 610 [40 CFR 60.] All affected facilities as defined in 40 CFR 60.2 shall comply with all applicable provisions in 40 CFR 60 Subpart A.
- Implement corrective action if the monitoring exceedances in 40 CFR 63.864(k)(1) through (k)(1)(vi) occur. Subpart MM. [40 CFR 63.864(k)(1)]
- 612 [40 CFR 63.866(a)] Develop a written startup, shutdown, and malfunction plan as described in 40 CFR 63.6(e)(3) that contains specific procedures to be followed for operating the source and maintaining the source during periods of startup, shutdown, and malfunction, and a program of corrective action for malfunctioning process and control systems used to comply with the standards. In addition to the information required in 40 CFR 63.6(e), include the requirements in paragraphs 40 CFR 63.866(a)(1) and (2). Subpart MM. [40 CFR 63.866(a)]

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
Activity Number: PER20050001
Permit Number: 2160-00001-V3
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UNF0001 West Monroe Mill # 31

- 627 [LAC 33:III.2113.A] Maintain best practical housekeeping and maintenance practices at the highest possible standards to reduce the quantity of organic compounds emissions. Good housekeeping shall include, but not be limited to, the practices listed in LAC 33:III.2113.A.1-5.
- Failure to pay the prescribed application fee or annual fee as provided herein, within 90 days after the due date, will constitute a violation of these regulations and shall subject the person to applicable enforcement actions under the Louisiana Environmental Quality Act including, but not limited to, revocation, or suspension of the applicable permit, license, registration, or variance.
- Permittee shall maintain records necessary to verify that all internal combustion engines located at this facility that are not otherwise regulated or exempted under Title V of the Clean Air Act qualify as non-road engines as defined by 40 CFR 89. At a minimum, these records shall indicate the location of each engine for the previous 12 consecutive months, the indicia of transportability, the non-applicability of any federal New Source Performance Standard, and the non-applicability of any standards promulgated under section 202 of the Clean Air Act. Make records available for inspection by DEQ personnel.
- The emission limitations on the following TAP's are designated as State-Only requirements: Ammonia, Barium and Compounds, n-Butyl Alcohol, Copper and Compounds, Diarninotoluene, 2,6-Dinitrotoluene, Methyl Ethyl Ketone, Nitric Acid, Pyridine, Sulfuric Acid, Toluene-2,6-Diisocyanate, Zinc and Compounds, Chlorine Dioxide, Hydrogen Sulfide.
- Alternate Operating Scenario: Operating plan recordkeeping by logbook upon each occurrence of making a change from one operating scenario to another. Record the operating scenario under which the facility is currently operating. Include in this record the identity of the sources involved, the permit number under which the scenario is included, and the date of change. Keep a copy of the log on site for at least two years. Comply with the requirements of PSD-LA-37. This permit includes provisions of the Prevention of Significant Deterioration (PSD) review from Permit PSD-LA-37.
- Include a certification statement with the annual emission report and revisions to any emission report that attests that the information contained in the emission report is true, accurate, and complete, and that is signed by a responsible official, as defined in LAC 33:III.502. Include the full name of the responsible official, title, signature, date of signature and phone number of the responsible official.
- Submit Annual Emissions Report (1ED): Due annually, by the 31st of March unless otherwise directed by DEQ, to the Office of Environmental Assessment in a format specified by DEQ. Identify the quantity of emissions in the previous calendar year for any toxic air pollutant listed in Table 51.1 or Table 51.3.
- Submit notification: Due to the Department of Public Safety 24-hour Louisiana Emergency Hazardous Materials Hotline at (225) 925-6595 immediately, but in no case later than 1 hour, after any discharge of a toxic air pollutant into the atmosphere that results or threatens to result in an emergency condition (a condition which could reasonably be expected to endanger the health and safety of the public, cause significant adverse impact to the land, water or air environment, or cause severe damage to property).
- Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, no later than 24 hours after the beginning of any unauthorized discharge into the atmosphere of a toxic air pollutant as a result of bypassing an emission control device, when the emission control bypass was not the result of an upset, and the quantity of the unauthorized bypass is greater than or equal to the lower of the Minimum Emission Rate (MER) in LAC 33:III.5112, Table 51.1, or a reportable quantity (RQ) in LAC 33:1.3931, or the quantity of the unauthorized bypass is greater than one pound and there is no MER or RQ for the substance in question. Submit notification in the manner provided in LAC 33:1.3923.

SPECIFIC REQUIREMENTS

AI ID: 1432 - Graphic Packaging International Inc - West Monroe Mill #31
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- 637 [LAC 33:III.5107.B.3] Submit notification: Due to SPOC, except as provided in LAC 33:III.5107.B.6, immediately, but in no case later than 24 hours after any unauthorized discharge of a toxic air pollutant into the atmosphere that does not cause an emergency condition, the rate or quantity of which is in excess of that allowed by permit, compliance schedule, or variance, or for upset events that exceed the reportable quantity in LAC 33:I.3931.
Submit notification in the manner provided in LAC 33:I.3923.
- 638 [LAC 33:III.5107.B.4] Submit written report: Due by certified mail to SPOC within seven calendar days of learning of any such discharge or equipment bypass as referred to in LAC 33:III.5107.B.1 through B.3. Include the information specified in LAC 33:III.5107.B.4.a.1 through B.4.a.viii.
Report all discharges to the atmosphere of a toxic air pollutant from a safety relief device, a line or vessel rupture, a sudden equipment failure, or a bypass of an emission control device, regardless of quantity, IF THEY CAN BE MEASURED AND CAN BE RELIABLY QUANTIFIED USING GOOD ENGINEERING PRACTICES, to DEQ along with the annual emissions report and where otherwise specified. Include the identity of the source, the date and time of the discharge, and the approximate total loss during the discharge.
- 639 [LAC 33:III.5107.B.5] Develop a standard operating procedure (SOP) within 120 days after achieving or demonstrating compliance with the standards specified in LAC 33:III Chapter 51: Detail in the SOP all operating procedures or parameters established to ensure that compliance with the applicable standards is maintained and address operating procedures for any monitoring system in place, specifying procedures to ensure compliance with LAC 33:III.5113.C.5. Make a written copy of the SOP available on site or at an alternate approved location for inspection by DEQ. Provide a copy of the SOP within 30 days upon request by DEQ.
Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 5 when the administrative authority declares an Air Pollution Alert.
Activate the preplanned strategy listed in LAC 33:III.5611. Table 6 when the administrative authority declares an Air Pollution Warning.
Activate the preplanned abatement strategy listed in LAC 33:III.5611. Table 7 when the administrative authority declares an Air Pollution Emergency.
- 640 [LAC 33:III.5109.C] Prepare standby plans for the reduction of emissions during periods of Air Pollution Alert, Air Pollution Warning and Air Pollution Emergency.
Design standby plans to reduce or eliminate emissions in accordance with the objectives as set forth in LAC 33:III.5611. Tables 5, 6, and 7.
Comply with the provisions in 40 CFR 68, except as specified in LAC 33:III.5901.
- 641 [LAC 33:III.5609.A.1.b] Submit Emission Inventory (EI)/Annual Emissions Statement: Due annually, by the 31st of March for the period January 1 to December 31 of the previous year unless otherwise directed. Submit emission inventory data in the format specified by the Office of Environmental Assessment.
Include all data applicable to the emissions source(s), as specified in LAC 33:III.919.A-D.
- 642 [LAC 33:III.5609.A.2.b]
- 643 [LAC 33:III.5609.A.3.b]
- 644 [LAC 33:III.5609.A]
- 645 [LAC 33:III.5901.A]
- 646 [LAC 33:III.919.D]